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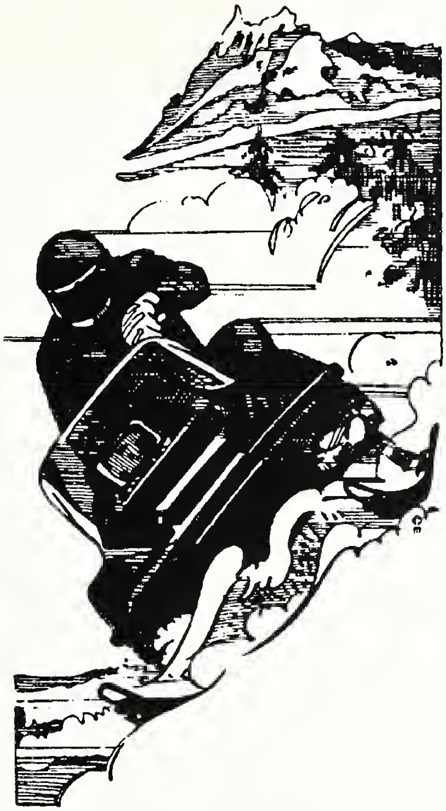

Programmatic Environmental Impact Statement

MONTANA SNOWMOBILE GRANT PROGRAM

September 1993

Prepared by:

Montana Department of Fish, Wildlife & Parks

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Montana Department
of
Fish, Wildlife & Parks

Helena, Montana
September 17, 1993

TO ALL INTERESTED PARTIES:

The enclosed programmatic environmental impact statement (PEIS) has been prepared by the Montana Department of Fish, Wildlife and Parks (DFW&P) and is available for public review. The PEIS analyzes the impacts on the quality of the human environment that would result from the Department's management of the Snowmobile Grant Program.

The Draft PEIS was released by DFW&P for public review and comment on March 30, 1993. Fifty-four comment letters were received during the comment period which ended April 30, 1993. In addition, local residents and interested parties were afforded the opportunity to comment during four public hearings that were held statewide during the end of April.

While not containing any major changes from the draft PEIS, the final PEIS contains corrections and clarifications of the original text. The letters and oral comments of the public as well as the responses from DFW&P have been included in Appendix E. Alternative 3, modification of the existing program, has been selected as DFW&P's preferred alternative.

After publication of this PEIS, DFW&P must make a decision whether to approve or disapprove the adoption of Alternative 3. The Department can make this decision no sooner than 15 days after release of the final PEIS to the public.

Further information, including additional copies of the final PEIS, may be obtained by contacting the Department at the following address:

Statewide Trails Program Coordinator
Montana Department of Fish, Wildlife and parks
1420 East Sixth Avenue
Helena, MT 59620

Sincerely,

Patrick J. Graham
Director

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Final
Programmatic Environmental Impact Statement

Montana Department of Fish, Wildlife and Parks

Snowmobile Grant Program

September, 1993

Montana Fish, Wildlife & Parks

Patrick J. Graham
Director

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COVER SHEET

Type of Statement

Final Programmatic Environmental Impact Statement (PEIS)

Action

Management of the Montana Snowmobile Grant Program

Lead Agency

Montana Department of Fish, Wildlife and Parks

Management Authority

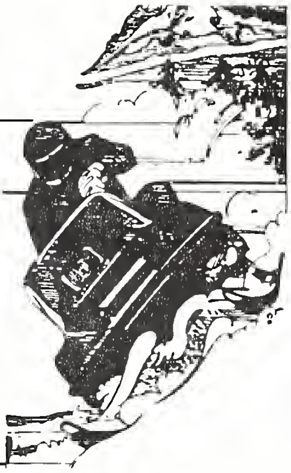
Montana Department of Fish, Wildlife and Parks

Abstract

The Montana Snowmobile Grant Program Final Programmatic Environmental Impact Statement describes the land, people, environmental, economic, and social resources that would potentially be affected by the grant program. The primary state action includes the administration of the Snowmobile Grant Program. The program provides for the management of groomed snowmobile trails and associated facilities across Montana for use and enjoyment by in-state and out-of-state recreationists. Alternatives have been developed in this PEIS to reduce, eliminate, or mitigate environmental impacts resulting from program management and associated actions. These include 1) the Department's program as currently administered, 2) discontinuance of the grant program under the Department, and 3) modifications to the existing grant program.

For further information, please contact:

Statewide Trails Program Coordinator
MT. Department of Fish, Wildlife & Parks
1420 East Sixth Avenue
Helena, MT 59620
(406) 444-4585



SUMMARY

THE PROGRAM

This summary presents information detailed in the Final Programmatic Environmental Impact Statement (PEIS) prepared on the Montana Snowmobile Grant Program. It provides the information necessary for the reader to understand what the program is, what alternatives are considered and what environmental impacts are expected.

Most of the changes in the final PEIS are found in Chapter 2, where descriptions of the program are clarified, and Chapter 4, where impact determinations were modified based on findings brought forth during the review process. Other minor text changes were made as noted throughout the comments.

The Montana Department of Fish, Wildlife and Parks, herein called "Department," administers Montana's Snowmobile Grant Program which provides for the developing, upgrading and maintaining of facilities for Montana's snowmobiling public and visitors. The program also includes snowmobile safety, education, and law enforcement.

Two sources fund the Snowmobile Grant Program. A five dollar registration decal fee is collected on all snowmobiles owned in the State of Montana. The remainder of the budget is generated from five-tenths of one percent of the Montana Distributor Gasoline Tax and is used for the development, operation, maintenance, and safety of public snowmobile facilities.

Montana hosts 28 distinct snowmobile trail systems--ranging from 30 miles to 350 miles--totalling over 3,200 miles in all (figure 1-2). These trails are groomed and maintained through grants made available by the Snowmobile Grant Program. These grants are applied for and sponsored by local snowmobile clubs, Chambers of Commerce and government agencies.

In addition to trail grooming, many grant sponsors use awarded funds for 1) development of new trails; 2) maintenance and upgrade of existing trails; 3) plowing of access roads and parking lots; 4) inventorying, installing, maintaining and removing signs and trail counters; and 5) maintaining Department grooming equipment.

Grant sponsors are responsible for 1) preparing grant applications; 2) developing annual operating plans with cooperating agencies; 3) providing information necessary for environmental reviews by land management agencies; 4) maintaining financial records; 5) submitting fiscal reports; 6) preparing grooming or construction contracts; 7) administering volunteers, and 8) providing regular information to Regional Parks Managers.

Regional Parks Managers are the primary contacts for the program and are responsible for program administration at the regional level. The Department's Helena office retains overall policy development authority, serves as the contact with other state and federal agencies, and meets with DFW&P's Snowmobile Advisory Committee to review applications and recommend final budgets.

THE PEIS PROCESS

Administrative rules implementing the Montana Environmental Policy act of 1971 (MEPA), define the procedures governing the EIS process in Montana. This final PEIS is written to meet the requirements of MEPA and its administrative rules.

These laws mandate the preparation of an EIS when any action taken by, or involving the State of Montana or agency of the Federal government may "significantly affect the quality of the human environment." Under this mandate, funding administered by the Department and the associated management of the snowmobile trail system is considered a State action that requires the preparation of an EIS. As a result, the Department is preparing this EIS under contract with Morrison-Maierle Environmental Corporation. This EIS is written in a "programmatic" format because it addresses the Snowmobile Program and not specific projects or trail systems. This means that no single trail system is analyzed in detail; rather, the analysis addresses the issues in a regional context. When individual projects are proposed through the grant program, site specific analyses, in compliance with NEPA and/or MEPA, will be required on a project-by-project basis. The land managing agency preparing the environmental document will not be able to "tier" or substitute impact findings from this PEIS. However, in cases where impacts are identified by site-specific NEPA and/or MEPA compliance procedures, the responsible land management agency could consult the PEIS for recommended modifications as identified under Alternative 3 and/or incorporated into Department policy.

DEVELOPMENT OF ALTERNATIVES

Under MEPA regulations, the Department is required to consider the environmental consequences of the current program and reasonable alternatives. The three alternatives addressed in this PEIS are 1) the "*no action*" (current program) alternative; 2) the *discontinue program* alternative; and 3) the *modified program* alternative.

Based on the range of environmental issues identified by the public, the Department identified ten environmental issues that would drive the development of alternatives and evaluation of impacts. They were--

- Issue 1--Concerns about gaps in the environmental review process, program administration and multiagency coordination efforts

- Issue 2--Changes in air quality in recreation-based winter communities and along snowmobile trails

- Issue 3--Changes in topography, soil stability and hydrologic processes on and adjacent to snowmobile trails

- Issue 4--Changes in wildlife behavior, habitat and population distributions -- particularly elk and grizzly bears
- Issue 5--Changes in productivity and stability of vegetation communities along and adjacent to snowmobile trails
- Issue 6--Changes in socioeconomic character of affected Montana communities -- including business income, personal income, population, public services and social well-being
- Issue 7--Changes in unique cultural, historical, and traditional values of an area
- Issue 8--Changes in the level of safety and private property rights in recreation-based winter communities and along snowmobile trails
- Issue 9--Changes in the character of winter recreational communities, areas bordering designated wilderness areas, and opportunities for solitude and non-motorized recreation (aesthetics/access)
- Issue 10--Changes in aesthetic values along trails and in recreation-based winter communities (noise, visuals, litter)

A number of alternatives were considered during the scoping process. Alternatives were developed in response to the above environmental issues to determine whether the negative impacts associated with the snowmobile program could be minimized. The following section summarizes the three alternatives considered:

Alternative 1--*Continue existing program as currently administered (No Action)*

Under this alternative, Department policy and responsibilities, application requirements, and recipient duties would be the same as currently defined.

Alternative 2--*Discontinue program within the Department*

Under this alternative, DFW&P administration of the program would be discontinued by the legislature and either eliminated entirely or assigned to another agency. It would be speculative and outside the scope of this PEIS to identify legislative intent under either of these scenarios. To analyze this alternative in the PEIS, it is assumed that the sport of snowmobiling would continue in Montana, albeit unregulated and without funding for established trail systems.

Alternative 3--*Existing program with modifications (Agency's Preferred Alternative)*

Modifications incorporated into the current program would include mitigating measures designed to reduce or eliminate negative environmental consequences. These are identified in the analysis of the current program (Alternative 1). A management strategy based on this alternative would involve modifications chosen by the Department. All other aspects of the Snowmobile Grant Program under alternative 3 would remain as described in Alternative 1.

Current Department policy regarding the management of the Snowmobile Grant Program would need to be changed in order to implement the modifications identified below.

Incorporating the modifications into the program under Alternative 3 would require that applicants prepare and submit additional information as necessary, in order for the Department to review the proposals and adequately determine compliance with program goals, environmental regulations and funding capabilities.

ENVIRONMENTAL CONSEQUENCES

Administrative

Impacts associated with the overall administration of the Snowmobile Grant Program involve potential future liabilities and associated fiscal burdens. Such impacts would result should the Department be held liable for environmental damage incurred from funded projects.

Lack of coordination with other agencies could lead to increased state lease and jurisdictional enforcement disputes as well as inadequate environmental considerations or avalanche safety consultation.

A policy of enhanced environmental review procedures, combined with a restructured review committee and modifications to the application requirements under alternative 3 would reduce potential legal and economic impacts to the Department. This would ensure continued management of the statewide network of snowmobile trails and associated facilities.

Air Quality

Air quality impacts are associated primarily with areas exhibiting high concentrations of snowmobile activity. Temperature inversions that keep emissions from snowmobiles, home heating units and automobiles from dispersing, serve to compound the impacts. Age, model, efficiency, temperature and fuel types of snowmobiles cumulatively influence the level of air quality impacts found in recreation based winter communities.

Air quality impacts along trails are less than in areas of intensified snowmobile activity. The network of trails making up most funded systems in Montana allows for dispersion of emissions from individual machines, thereby reducing the cumulative affects found in recreation based winter communities.

Impacts under Alternative 3 would be less than Alternatives 1 and 2 as a result of 1) improved public awareness, 2) expanded system configurations, and 3) support for industry and legislative reforms.

Topography

Topographic impacts would be limited to occasional cut-and-fill activities associated with trail and facility development and expansion projects. Cut-and-fill would be necessary in some instances to provide for a level surface on which groomers could operate safely.

Under Alternative 3, the Department would conduct an environmental review of the cut-and-fill activities to ensure compliance with policy, thereby reducing topographic impacts. Any activity determined to result in negative impacts would be reevaluated and mitigating measures would be required before approval.

Soils

Soil impacts would be associated primarily with early and late season snowmobiling in areas of insufficient snowcover, such as wind-swept ridges, south facing slopes, and wet meadow areas. Such activity could lead to a destabilization of soils and eventual erosion. Vegetation could also be destroyed in situations where revegetation success and biological productivity are low. Snow compaction and blockage of subsequent runoff could promote erosional forces that would alter both the stability of soil and runoff characteristics.

Under Alternative 3, signing, avoidance and increased awareness by early and late season snowmobilers would diminish the disturbance of exposed soils and decrease the impacts on erosion and productivity.

Roads and Trails on Public Lands

The physical integrity of multiple use roads and trails could be impacted by erosional forces. These forces are caused by changes in snowmelt runoff patterns not planned for in the original design criteria. While the compacted snow protects the road or trail while it is in place, it retards melting rates further, relative to the infiltration capacity of soils--ensuring deep saturation and slow drying. Saturated roads and trails are susceptible to traffic induced damage that requires costly repair. The concentration of runoff along the edges of compacted snow may increase erosion along the edge. The impacts remain unchanged under each alternative.

Hydrology

Snow compaction, as well as vegetation and soil disturbances caused by snowmobiling on areas of insufficient snowcover, could impact runoff and discharge characteristics. Channel configurations could be altered by compacted snow across the direction of flow, or by erosional forces, causing changes in flow and discharge characteristics.

Water management could be impacted by snowmobile activities that 1) increase the potential for soil erosion, 2) change the melting and runoff characteristics of watersheds, and 3) alter the discharge characteristics of stream channels .

Signs and increased awareness by early and late season snowmobilers under alternative 3 would reduce the impacts on stream flow and discharge configurations resulting in fewer impacts on water management efforts.

Wildlife

Studies on the impacts of snowmobile disturbance to wildlife offer a wide range of conclusions. Winter conditions, particularly where conditions are good for snowmobiling, can be harsh for many species of wildlife. Many of the earlier studies, largely of short duration and measuring overt responses, generally conclude that snowmobile activity has limited impacts to ungulate habitat and population distribution. However, more recent physiological studies which lend themselves to measuring more subtle responses, have indicated that snowmobile activity could result in unnecessary stress and energy expenditure by the animals at inopportune times of the year. Exposure time and type of snowmobile activity (i.e. passing by vs. stopping, standing or walking, etc.) could have an influence on the degree of impact to the animals. As the level of snowmobile activity increases due to population increases, long term impacts will be greater than short term impacts under all alternatives.

Grizzly bears could be impacted if late season snowmobile activity is located near dens or in the proximity of ungulate wintering areas where bears commonly scavenge for carcasses upon emergence from hibernation.

Impacts under Alternative 2 would be similar in nature but more severe than those identified under Alternative 1. Limited funding and enforcement authority would encourage unregulated snowmobile activities in wildlife habitat.

Clearance oversight, avoidance, seasonal restrictions, and public awareness policies established in Alternative 3 would serve to provide minimal disturbance to wintering wildlife, thus reducing the potential impacts identified under Alternatives 1 and 2.

Vegetation

Impacts to vegetation on existing prepared, unvegetated roadbeds would be non-existent. Snow depths, and the amount, frequency, and duration of trail use determine the level of impacts on trails constructed over established vegetation. Impacts in the form of mechanical breakage and abrasion could be caused by striking exposed vegetation on the trail (i.e. tree plantations, saplings, tops of larger trees, etc.). Herbaceous vegetation would be impacted in areas with insufficient snowcover such as ridge lines, southern exposures, and in the early and late season.

With the development of new trails, noxious weeds could be introduced by their seeds being physically transferred on snowmobiles. In addition, if large game animals were to be displaced from a traditional winter range by snowmobile related activity, concentrated browsing, foraging, resting, and breeding activities in the areas of relocation could cause vegetative carrying capacities to be exceeded.

Under Alternative 3, 1) signing, 2) avoidance, and/or 3) increased awareness by early and late season snowmobilers would diminish the disturbance on vegetation.

Socioeconomic

The Snowmobile Grant Program would provide economic benefits to the State of Montana under each alternative by promoting and providing for a structured system of trails designed for both in-state and out-of-state recreationists. Income to recreation-based winter communities would be generated from direct program-related employment and snowmobile-related spending activities such as fuel supplies, motels and restaurants.

Snowmobilers and those individuals associated with the sport would realize positive social impacts from the Snowmobile Grant Program through enjoyment of the sport and because of the promotion of safety, law enforcement and trail grooming. Non-motorized recreationists, seeking quiet, peaceful recreation, could be impacted by disturbances associated with snowmobiling activities. (see also Recreation section).

Negative social impacts would be reduced under Alternative 3. Policy changes could provide restrictions on impactive activity as identified in Aesthetic and Recreation discussions.

Cultural

Impacts to cultural resources would be those associated with 1) trail construction, 2) snowmobile and grooming activities on areas of insufficient snowpack, and 3) intentional vandalism. Trail construction would disturb surficial and shallowly buried archaeological sites as well as interrupt the visual integrity of historic sites. Snowmobile and grooming activities could impact the integrity and character of historic trails by the clearing of vegetation or by erosional influences caused by compacted snow. Access provided by funded snowmobile trails could lead to indiscriminant or intentional damage to historic structures.

Impacts under Alternative 3 would be reduced through improved cultural evaluations on proposed trails as determined necessary by the Department.

Aesthetics

Except for areas inflicted with poor air quality, visual impacts would typically be greatest in areas with high scenic quality and few man-made developments. These impacts would be related to visual intrusions from snowmobile activity on non-motorized recreationists seeking quiet enjoyment of Montana's many back-country areas. Positive impacts are also realized by snowmobilers who have the opportunity to access Montana's back-country areas. Impacts on visual resources are viewed very subjectively by different individuals, thus making it difficult to assess specific impacts on anything but an individual basis..

Negative visual impacts would be diminished under Alternative 3 with improved trail location strategies, waste management strategies and improved public awareness.

Noise impacts would occur both on and adjacent to funded snowmobile trails and in recreation based winter communities. Noise levels from snowmobiles in the back-country could be disruptive to non-motorized recreationists. Noise levels in communities from increased concentration of snowmobile activity could impact residents and the non-snowmobiling public.

A policy calling for a combination of mitigating actions would reduce the level of noise related impacts under Alternative 3. These would include 1) public awareness programs, 2) avoidance areas, and 3) time schedules.

Recreation

Recreational impacts are limited to trail use conflicts associated with shared use of trails and disturbance of non-motorized recreationists who are within visual and audible range of established trails and non-funded "play areas", as well possibly causing their displacement from these areas. The opportunity provided by funded snowmobile trails results in positive recreational impacts to in-state and out-of-state snowmobilers.

The impacts associated with trail conflicts and disturbances to non-motorized recreationists would be reduced by 1) avoidance, 2) signing, 3) public awareness, and 4) hourly restriction policies included in Alternative 3. Recreational opportunities for the snowmobiling public would continue under this alternative.

Land Use

Impacts to land use would be limited under all alternatives. Minor land use changes would occur upon construction of new trails. Development of new trails in previously undisturbed areas would constitute a change to developed land use.

Cumulative Impacts

Recreation

Winter--Cumulative impacts associated with other winter recreational opportunities is addressed in Recreation, Socio-economic, and Aesthetic sections.

Summer--Impacts to soils, vegetation, hydrology, aesthetics and cultural resources, as discussed earlier in this summary, could be compounded by utilization of snowmobile trails in the spring by hikers, cyclers, horseback riders, and off-road vehicles. Cumulative effects attributable to the snowmobile program would be limited to newly constructed trails whose past, present and future uses would be snowmobile-related.

Industrial/Agricultural Operations

Logging/mining--Impacts to soils, vegetation, hydrology, aesthetic and cultural resources could be compounded in the spring if snowmobile trails were to be utilized by logging or mining equipment prior to the trails being sufficiently dried. The compaction of snow, as discussed in the Soils and Hydrology sections of this summary, could cause trails to retain moisture longer into the spring, thereby making them more susceptible to degradation by wheeled vehicle traffic.

Logging or mining operations in the winter could compound safety problems on snowmobile trails if equipment was to use or cross trails without adequate warning precautions.

Ranching/farming--Impacts to soils, vegetation, hydrology, aesthetics and cultural resources, as identified in their respective discussions, could be compounded if cattle were released for grazing in areas where trails have snow remaining or runoff occurring. The delay in snowmelt and subsequent runoff could result in an increased level of erosive activity which could ultimately impact stream channels, vegetation, soil stability, and the aesthetic quality of an area.

Early spring clearing of high-altitude roads and trails on public land used for cattle grazing could impact late-season snowmobiling by disrupting the network of trails funded under the program.

Commercial operations

Snow tours--Large, commercially sponsored tour groups could combine with existing traffic levels on trails to increase safety as well as aesthetic impacts. Sponsored tours typically consist of either many individual snowmobiles or a few larger touring machines. Both tour scenarios increase the opportunity for accidents by creating more congestion in areas utilized by other snowmobilers. The wide configuration of touring machines could make it difficult for oncoming snowmobiles to maneuver, thereby increasing the potential for accidents.

Tours consisting of many individual machines could create situations in which snowmobiles operating in the opposite direction, or those attempting to pass the slower touring machines, would be unable to maneuver in a safe manner because of trail configuration or oncoming traffic. In such instances, safety for snowmobilers could be jeopardized.

Aesthetic impacts, as discussed in their respective sections in this chapter, could be compounded by the increased number of individual machines and size of the larger touring machines.

COMPARISON OF ALTERNATIVES

Potential impacts identified for most resource areas under Alternative 1 would be compounded under Alternative 2. The discontinuation of the Snowmobile Grant Program would result in unregulated activities associated with the sport of snowmobiling. By establishing modifications to the program and enforcing subsequent policy changes under Alternative 3, potential impacts would be reduced.

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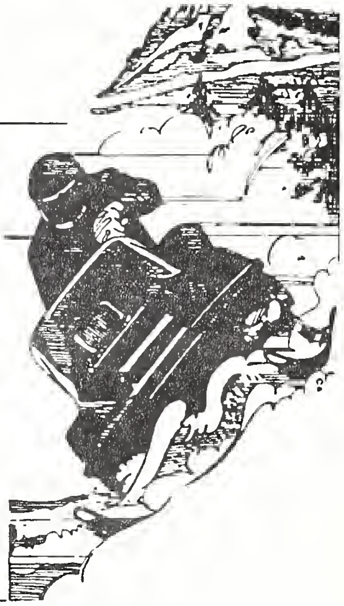


1

INTRODUCTION

This final Programmatic Environmental Impact Statement (PEIS) discloses the possible environmental consequences associated with the Montana Department of Fish, Wildlife and Parks' Snowmobile Grant Program. It is the culmination of a process involving intensive public input, extensive reviews and thorough analyses by agency officials and technical specialists. This final PEIS embodies and documents the Department's existing snowmobile grant program and alternatives for future management direction.

PURPOSE OF THE PEIS AND SCOPE OF ANALYSIS

Procedures governing the EIS process in Montana are defined in administrative rules implementing the Montana Environmental Policy Act of 1971 (MEPA). This final PEIS is written to meet the requirements of MEPA and the Department's administrative rules implementing the statute.

Under the Montana Environmental Policy Act, the Department is required to prepare a detailed statement on environmental impacts of programs significantly affecting the environment 75-1-201(1) (b)(iii), M.C.A. (Montana Codes Annotated). Under Department rules, an "action" includes a program directly undertaken by an agency and project or activities supported through a grant -- ARM 12.2.429(1) (Administrative Rules of Montana). The Department must conduct a "programmatic review" to analyze the impacts of a series of actions, programs, or policies, ARM 12.2.444 (1). If a project funded through a snowmobile grant is on federal land, the federal agency may also be required to conduct a site-specific NEPA review, unless the project falls within one of its own categorical exclusions.

Under MEPA, funding administered by the Department and the associated management of the snowmobile trail system is considered a state action that requires the preparation of an Environmental Impact Statement (EIS). As a result, the Department is preparing this EIS with assistance from Morrison-Maierle Environmental Corporation of Helena. This EIS is written in a "programmatic" format because it addresses the Snowmobile Program and not specific projects or trail systems. This means that no single trail system is analyzed in detail; rather, the analysis addresses the issues in a regional context. When individual projects are proposed through the grant program, site specific analyses, in compliance with NEPA and/or MEPA, will be required on a project-by-project basis. The land managing agency preparing the environmental document will not be able to "tier" or substitute impact findings from this PEIS.

However, in cases where impacts are identified by site-specific NEPA and/or MEPA compliance procedures, the responsible land management agency could consult the PEIS for recommended modifications as identified under Alternative 3 and/or incorporated into Department policy.

The purpose of the PEIS is to provide a complete disclosure of the consequences associated with the Snowmobile Grant Program and present alternatives in a manner that will assist the Department in 1) reviewing snowmobile trail project proposals, 2) inspecting trail systems, and 3) monitoring compliance with Program requirements. The PEIS will be available for use by the grant applicants in preparing applications for funding and establishing appropriate mitigation measures for any negative environmental consequences. Upon funding, the PEIS will be available as a reference guide for the sponsors to use in managing the individual trail systems in accordance with the program requirements and PEIS findings.

NEED FOR THE ACTION -- STATE ACTION

In addition to the EIS requirements set forth by NEPA and MEPA, the Department has made the preparation of this PEIS a priority in the management of the Snowmobile Grant Program. Increased demographic pressures in key recreation centers throughout Western Montana, coupled with a marked increase in the popularity of snowmobiling among both in-state and out-of-state recreationists is taxing the program's resources and setting the stage for a public and political call to action. The Department is preparing this PEIS to proactively address the issues of concern and develop solutions to consequences identified in the PEIS.

THE SNOWMOBILE GRANT PROGRAM -- DESCRIPTION AND HISTORY

Montana's Snowmobile Program provides for the developing, upgrading and maintaining of facilities for Montana's snowmobiling public and visitors. Snowmobile safety, education, and law enforcement efforts are also key components of the program.

The Snowmobile Program receives primary support from two sources of funding. In 1973, legislation aimed at providing funds for snowmobile facilities was passed (23-2-616, M.C.A.). Under this legislation, snowmobile registration decal fees ($2.00) were imposed on individuals who own machines in the State and operate them on public lands. These fees were increased by the 1993 session of the Montana legislature to $5.00 per machine and are administered by the Department of Fish, Wildlife and Parks. $2.50 is designated for use in developing snowmobile facilities and $2.50 for snowmobile related law enforcement.

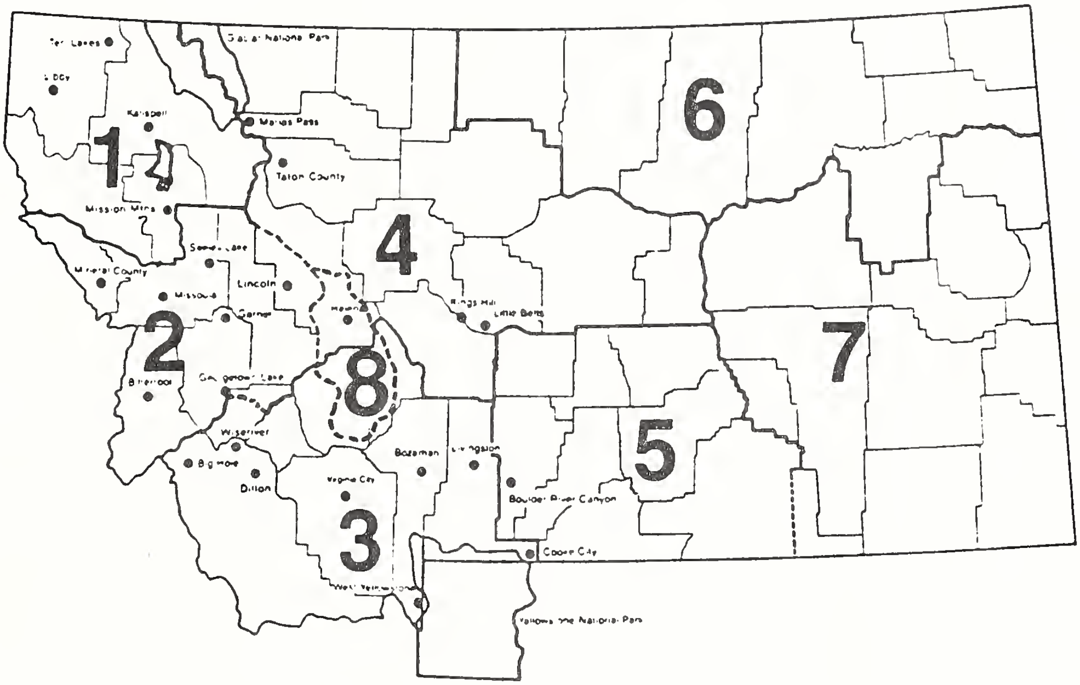
In 1977, the legislature, under section 60-3-201(b)(5), M.C.A, allocated three-tenths of one percent of Montana's "Distributor Gasoline Tax" for the development, operation and maintenance of public snowmobile facilities and for promoting snowmobile safety. In 1979 this allocation was increased to five-tenths of one percent, where it remains today. This percentage of gas tax was computed from a study that estimated the amount of Distributor Gasoline Tax paid by snowmobile users for gas consumed in snowmobiles.

Currently, annual revenue from both of these sources totals approximately $471,000, with $30,000 of that being generated from the registration decal fee. The funds from these two sources are placed in the State Special Revenue Fund for administration by the Department of Fish, Wildlife and Parks. Ninety percent of the gasoline tax revenue is used to "develop and maintain snowmobile facilities open to the general public at no admission cost." The remainder of the tax revenue deposited in the revenue account is "used to promote snowmobile safety" (60-3-201 (5), M.C.A.).

Other Department fees include a six-dollar, non-resident temporary permit fee. Half of this fee is applied to maintaining, developing, and operating facilities. The other half is used for administration of the program. All of the revenue generated from a one-dollar duplicate decal fee is allocated to the enforcement program. Snowmobile dealers are required to pay a fifty-dollar application fee. One-half of this fee is applied to maintaining, developing and operating facilities, while the other half is allocated for enforcement. Finally, revenues generated from fees associated with fines and forfeitures (other than those collected by justice court) are applied to the safety and education program.

The Department's Parks Division has management authority through its central Helena office and eight regional offices (figure 1-1) for the facility development, operations, and maintenance portion of the program. Safety and education activities are administered by the Department's Conservation Education Division. Law enforcement is the responsibility of the Enforcement Division.

Figure 1-2 regions



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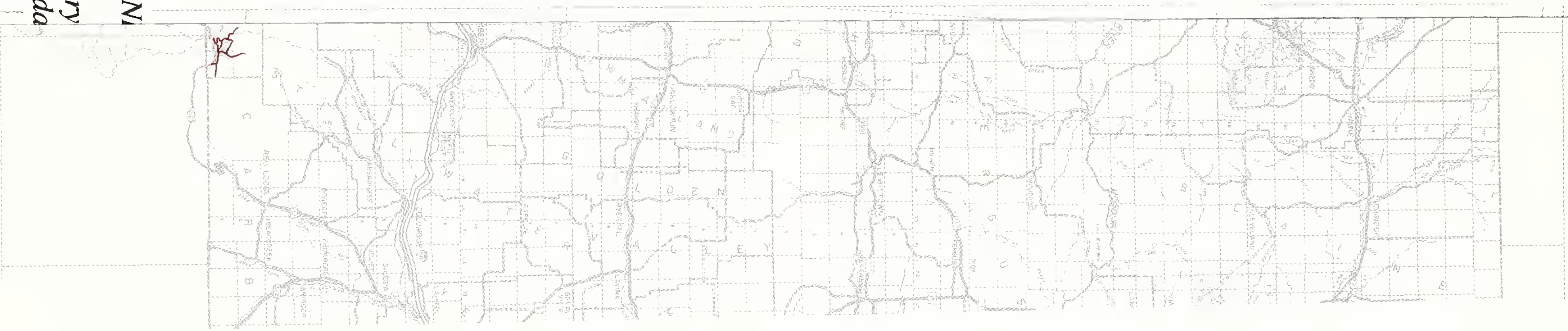


Figure 1-2

FUNDED SNOWMOBILE TRAILS

Montana Department
of
Fish, Wildlife & Parks

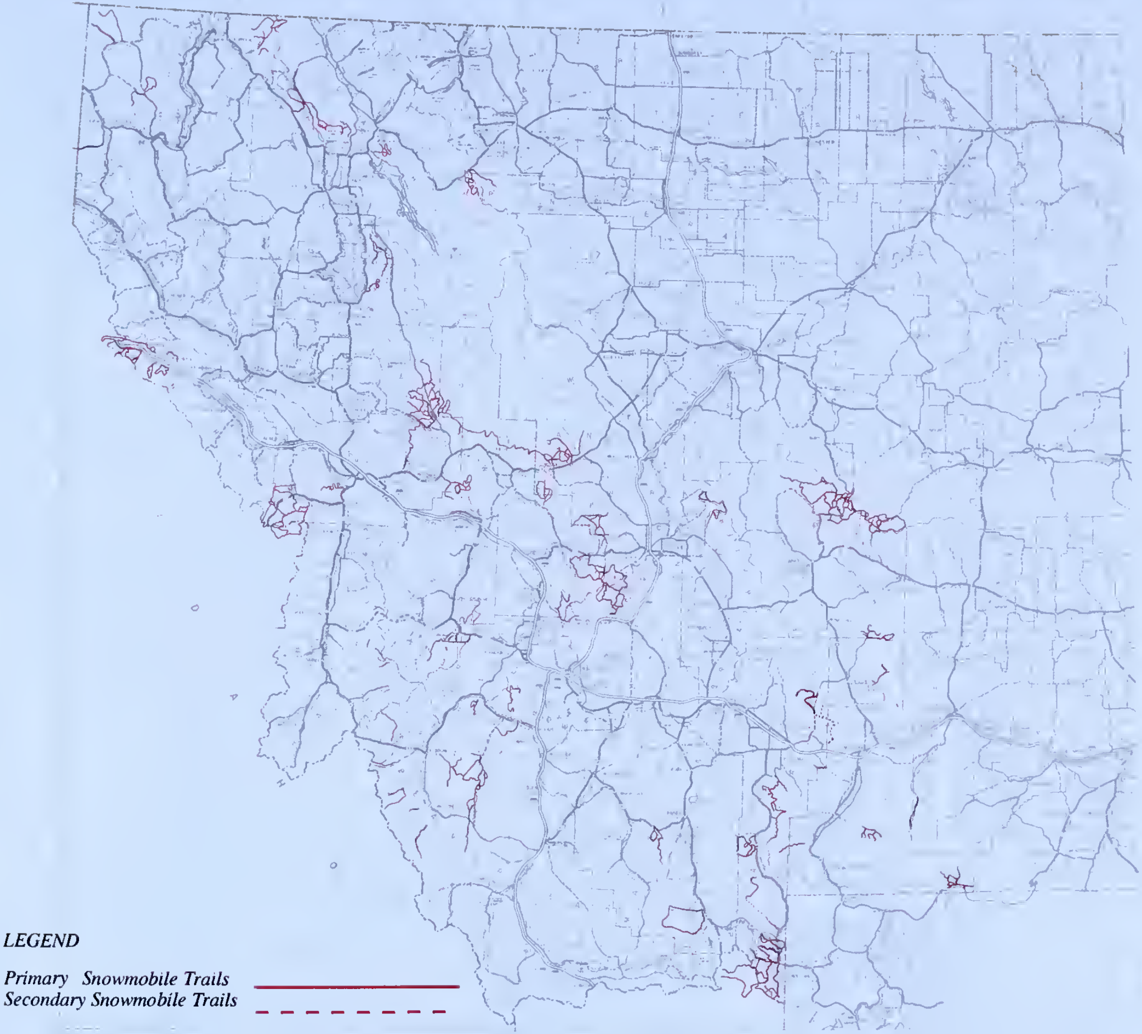


Figure 1-2

FUNDED SNOWMOBILE TRAILS

Montana Department
of
Fish, Wildlife & Parks

Montana hosts 28 distinct snowmobile trail systems around the state--ranging from 30 miles to 350 miles--totalling over 3,200 miles in all (Figure 1-2). These trails are groomed and maintained through grants made available by the State Snowmobile Program. The grants are applied for and sponsored by local snowmobile clubs, Chambers of Commerce, and government agencies. Seventeen of these areas lease department equipment to do their trail grooming. Forty-five pieces of equipment, together with snowmobiles utilized by Department personnel, make up an equipment inventory valued at over $750,000.

In addition to trail grooming, many grant sponsors utilize awarded funds for 1) developing new trails; 2) maintaining and upgrading existing trails; 3) plowing access roads and parking lots; 4) inventorying, installing, maintaining and removing signs and trail counters; and 5) maintaining Department grooming equipment. Grant sponsors are also responsible for the 1) preparation of grant applications; 2) development of annual operating plans with cooperating agencies; 3) maintenance of accurate financial records; 4) submittal of fiscal reports; 5) initiation of multi-party agreements; 6) preparation and administration of private groomer contracts; 7) maintenance of volunteer records; and 8) meeting regularly with Regional Parks Managers and local land management agencies.

Although the program is administered through the Department of Fish, Wildlife and Parks, each trail system is the responsibility of local clubs and landowners. The quality and quantity of each system is the direct result of commitments by the grant sponsors and contributions from local participants. Their efforts include 1) facility and trail development; 2) maintenance and improvement; 3) trail use counts; 4) signing, and other management responsibilities.

AGENCY RESPONSIBILITIES

Montana Department of Fish, Wildlife and Parks

In an effort to "streamline" the administration of the Program, Department regions were designated as primary contacts for the program in 1986. This action assigned the following responsibilities to the Regional Parks Managers:

Club-specific Grant Administration-- The administration of club-specific grants begins early in the process of applying for the grant. The Regional Manager distributes grant information and the application paperwork to the interested applicants. Upon request by the applicant, the Regional Manager provides grant preparation assistance which could include input into the development of the plan of operations or fiscal plan. Once completed, the Regional Parks Manager reviews the grant for completeness to make sure it meets the requirements necessary for review in Helena. The Regional Supervisor then approves the Regional Parks Manager's recommendation and forwards the application to Helena for review. If the grant is awarded, the Regional Parks Manager 1) authorizes the proposed budget, 2) tracks the recipient's grant expenditures, 3) makes preparations for lease requirements and 4) assures registration compliance.

Technical Assistance--The Regional Parks Manager provides technical assistance during the application process. Levels of assistance range from providing design specifications for trails and other facilities, to identifying environmental baseline needs. The Managers also provide technical assistance to grant recipients conducting trail work. Levels of assistance range from providing technical guidance during construction to legal guidance in order to ensure compliance with local, state and federal regulations.

Coordination--During the application process and snowmobile season, the Regional Parks Manager must maintain open channels of communication with other agencies, district repesentatives of the Montana Snowmobile Association (MSA), clubs and other Department divisions. Because of the interacting network of trails that are sponsored by the Grant Program, many parties are involved in the application, maintenance/operation, enforcement and safety processes. The Regional Parks Manager serves as a clearinghouse for informational and assistance resources.

Sign Inventories--Signing programs have been established for all funded trail systems sponsored by the Grant Program. It is the responsibility of the Regional Parks Manager to inventory the existing stock of trail signs and provide the necessary signs to grant recipients upon request and approval under the Grant Program.

Equipment Inspections--As discussed in Chapter One, the Department has an inventory in excess of forty-five pieces of equipment. This equipment is commonly leased to grant recipients for maintenance of trails funded under the Grant Program. In such cases, it is the responsibility of the Regional Parks Manager to regularly inspect the department-owned equipment. This responsibility is generally delegated to the Regional Parks Maintenance Supervisor and is often included as part of a trail inspection by the Regional Parks Manager. The inspection includes a recording of the condition of the equipment as well as a review of the operator's daily operation logs. Inspections are normally conducted at the end of the season.

Trail Counts--Trail-use counts assist the Regional Parks Managers to estimate trends in trail use, provide useful information to land management agencies and are considered in the allocation of trail-use funds. The individual clubs or grant recipients are responsible for installation and maintenance of the counters. The Regional Parks Manager provides the Trail Counter Report forms to the appropriate recipients. The trail-count information from these forms is used by the Regional Parks Manager to prepare a regional Snowmobile Count Record which is sent with the application to the statewide coordinator in Helena.

Trail Inspections--Three levels of trail inspections occur under the Grant Program. Regular/routine and seasonal inspections are conducted by the individual clubs or grant recipients. Random trail inspections are conducted by the Regional Parks Manager and/or the cooperating land-management agency. Random inspections include a visit to each trail system at least once every three years. The Parks Manager is not expected to inspect each trail every year. For each trail inspection, a Snowmobile Trail and Signing Report is to be completed and submitted to the Regional Parks Manager who forwards a copy to the Department's snowmobile Safety Coordinator. If such inspections identify a problem, the recipients' grooming committee investigates to determine if the hazard can be either eliminated, or altered, or if it should be signed. The Regional Parks Manager is contacted for further action if the problem persists .

Representing the Department--The Regional Parks Manager is expected to represent the Department at meetings pertaining to the Grant Program within the region. Such representation ensures open channels of communication between the individual grant recipients, other land management agencies, and the Department.

The Department's Conservation Education Division maintains the following responsibilities:

Sign Inventories--The Conservation Education Division provides snowmobile trail signs for groomed trail projects in order to foster safer, more enjoyable trail experiences. These signs are available to the clubs through the Regional Parks Manager and include trail markers, guidance, regulatory and warning signs. Signing is performed in cooperation with the Forest Service, Bureau of Land Management (BLM) and private land-owners.

Develop Trail Information and Publications-- The Conservation Education Division works in cooperation with groups such as the Forest Service, snowmobile clubs, Chambers of Commerce, International Association of Snowmobile Administrators, National Snowmobile Foundation, snowmobile manufacturers, as well as others, to develop safety and education items. These items include maps, brochures, tv and radio public service announcements, billboards, placemats, tent cards, and etc. Multi-media approaches are used to inform and educate the snowmobiling and non-snowmobiling community.

Promote Safety Education--Using the Department's safety manual, Snowmobile Safety and You, the Conservation Education Division promotes voluntary study courses. These courses are either conducted on an individual basis or taught in a classroom by volunteer instructors called Snowmobile Safety Officers. Organized classes or workshops such as snowmobile safety, avalanche awareness and winter survival are also arranged by the division.

Coordinate Accident Reporting System--The Department provides snowmobile accident report forms to Department wardens and other law enforcement agencies. The Conservation Education Division collects and examines these accident report forms and submits a report to the International Association of Snowmobile Administrators.

Maintain Supply of Snowmobile Trail and Signing Report Forms-- Trail inspections are performed by groomer operators, club officers and/or Park Manager. The report documents the quality of the grooming operation and identifies problems. The Conservation Education Division ensures these forms are available and utilized.

The Department's Law Enforcement Division Maintains the following responsibilities:

Law Enforcement -- The Department's enforcement officers are specifically responsible for the enforcement of the laws which prohibit the driving or harassment of protected wildlife and livestock from a snowmobile, the discharging of firearms from a snowmobile, and the enforcement of the sound level limitations (78 dBA at 50 feet, SAEJ 192).

Sheriffs, highway patrol, and the police share with the Department in the enforcement of all snowmobile laws, including registration decal compliance, within their jurisdictions.

The Conservation Education and Enforcement Divisions, together with the Regional Parks Manager and cooperating agency representatives, serve to promote safe, hazard-free use of trails.

The Helena office retains overall policy development authority, program oversight and application review responsibilities. The Helena office also serves as the contact with the regional office of the United States Forest Service, the state office of the Bureau of Land Management and the statewide Montana Snowmobile Association organization and Advisory Committee.

The Montana Snowmobile Association serves as an advisor to the Department through a Snowmobile Program Advisory Committee. MSA and the Department cooperatively established the need for the preparation of this PEIS in support of the proper recreational uses of snowmobiles on public and private lands and to promote the protection, preservation and enhancement of all natural and environmental resources.

Public Agency Responsibilities

Most of the trails groomed under this program are located on United States Forest Service lands, and to a lesser extent, on Bureau of Land Management, State Forest and Indian Reservation lands. Cooperative agreements are in place with these agencies to ensure informed management of the Snowmobile Grant Program. Responsibilities of the cooperating agencies include, but are not limited to 1) informing clubs of activities that may affect the local program, 2) allowing its lands to be used for snowmobiling subject to travel restrictions and other regulations, 3) allowing trail grooming and facility development on its lands following review of and in accordance with annual operating plans, 4) preparing environmental analyses, 5) meeting with clubs and the Department when needed, 6) providing manpower, equipment, signs and materials for development and operation of the Snowmobile Program when appropriate and available, 7) performing random trail inspections, and 8) providing technical guidance for trail placement. Information from public agency land management plans and environmental documents are used in support of Department review and analyses procedures.

Land management agencies are responsible for necessary review, study, legal mandates/executive orders and final decisions for trails activities on their land. Contingent upon land managing agency approvals, cooperative agreements are put in place with these agencies to ensure informed management of the Snowmobile Grant Program.

U.S. Forest Service . Because most groomed snowmobile trails in Montana are on Forest Service lands, the Department coordinates closely with the appropriate District Ranger to ensure all information is received and proper steps are taken to comply with federal regulations. If grant applicants propose activity on Forest Service property, the plan is reviewed by the District to ensure compliance with the *Forest Plan* and individual *Travel Management Plan*. If the District Ranger determines that an Environmental Assessment, Biological Assessment, Cultural Resource Clearance or Special Use Permit is needed, the District Ranger, Department, and the grant applicant work together to produce the required documents. Upon completion of the appropriate assessments, the District Ranger prepares a decision document explaining the District's findings, recommendations and final decision. If approved, the plan is signed and submitted with the grant application to the Department of Fish, Wildlife and Parks.

Montana Department of State Lands . Some trail systems require passage through State Trust Land managed by the Montana Department of State Lands (DSL). The management of trails across State Trust Lands requires that the party proposing the activity acquire the appropriate *land use licenses* (26.3.133 &160 (ARM)) through coordination with appropriate DSL field offices. Coordination efforts include reviews of the applicant's plan of operations and preparation of an Environmental Assessment for right-of-way uses. The applicant must work with the Department and the DSL field office to provide additional information necessary for the preparation of the EA. Depending upon the findings and recommendations in the EA, the applicant could choose to withdraw, amend, or submit the plan with the application to the Department for consideration.

Bureau of Land Management. In some instances, trail projects are proposed on land managed by the Bureau of Land Management (BLM). A plan of operations describing the proposed action and any mitigating measures must be prepared and submitted to the appropriate field office. BLM representatives will then review the plan to ensure it satisfies requirements set forth in the BLM *Resource Management Plan*. If the agency concludes that the proposed activities require an Environmental Assessment, the applicant must work with the representative and the Department to provide any additional information necessary to prepare the document. Depending on the outcome of the decision, the applicant may choose to withdraw, amend or submit the plan with the application to the Department for consideration.

Department of Fish, Wildlife and Parks Management Areas. The majority of the Department's Wildlife Management Areas (WMA) have been purchased to provide winter range for wildlife, and as such, are not open to snowmobile or other human use from the end of the general hunting season to May 15 of each year. When a snowmobile trail is proposed to traverse through a WMA, the Regional Wildlife Manager must deem it compatible with the management direction detailed in the area management plan. It must also be included as an amendment to that plan and approved by the Regional Supervisor.

Indian Reservations. If a sponsor proposes a trail that crosses Indian reservation land, a written agreement between the tribal council and the trail sponsor must be negotiated and submittted with the project application.

In some cases, the land management agency and the grant applicant may be one and the same. In such instances, the proposed project must still satisfy the requirements set forth in the particular land management agency's Land Management Plan and the application must be submitted to and reviewed by the Department. Grant administration and distribution of funds is carried out in the same manner as with other grant recipients.

Depending on the type and location of activity proposed, a number of other agencies may require limited involvement. These agencies and a summary of their involvement follows:

National Parks. Many proposals include development and maintenance activities that border National parks or connect with the park's snowmobile trail system. It is necessary for the applicant to coordinate the necessary approvals from the park. In most cases the coordination effort is limited to approvals necessary to connect with park service trails and associated facilities. However, if the proposal includes activities that could significantly impact the Park's system, the proposal may be reviewed by the Park Service in relation to its Winter Use Plan. If enough concern over potential impacts is generated, an Environmental Assessment may be needed.

County Conservation District. If a proposal includes the development or maintenance of a snowmobile trail facility within the mean high water line of a perennial stream, a 310 Permit may be required under the Natural Streambed and Land Preservation Act. Such activities may include the construction of bridges, trails or other facilities in the summer season and maintenance of such facilities in the winter. In these instances, the Department of Fish, Wildlife and Parks provides recommendations and consultation for acquiring the permit. Similarly, if the proposal includes construction activities within the mean high water line of a perennial stream, an FG Form 124 may also be necessary from the Department of Fish, Wildlife and Parks.

County Disaster and Emergency Services Coordinator. Similar to the above requirement, if the applicant proposes construction of a snowmobile facility within a designated 100-year floodplain, a floodplain permit may be required from the CDESC.

County Commissioners. If a sponsor proposes a funded trail on a county road, the sponsor should provide, with their application, a copy of the written approval, or a copy of the transmittal letter to the county commissioners which includes the date of the approval and any special conditions of the approval.

City Government. If a sponsor proposes a funded trail on a municipal street, a copy of the municipal ordinance allowing such use must be provided with the application.

Private Landholders. If a sponsor proposes a funded trail that crosses private land, a written agreement or lease is preferred. However, verbal agreements are a legally acceptable option. Two sponsor members should be in attendance when the verbal agreement is made. The sponsor is to then provide a subsequent letter to the landholder confirming the date of the meeting at which the verbal agreement was made and any special conditions of the agreement. A copy of that letter must be submitted with the project application.

PUBLIC INVOLVEMENT PROCESS

Public participation is a key element in the PEIS process. The scope of the PEIS is driven by issues, opportunities and concerns identified by the public in the "scoping" phase of the project. Issues, opportunities and concerns identified by the public were then classified by levels of significance and subsequently analyzed to determine overall impacts of the program. The public was also called upon to assist in the identification of alternatives and mitigations associated with the program.

Eight public scoping meetings were held across Montana August 17-27, 1992. Meetings were held in Bozeman, Great Falls, Billings, West Yellowstone, Missoula, Kalispell, Seeley Lake, and Helena. Individuals and citizens representing various interest groups attended the meetings and provided numerous comments regarding this PEIS project, the Snowmobile Program and other topics. The issues identified during the public and agency scoping process are summarized in Table1-1.

Table 1-1 *Summary of issues identified during Snowmobile Program scoping meetings*

Access

How does access provided by the program impact private property, open areas, roadless areas, and wilderness areas?
What are the impacts of limiting access to snowmobilers?
How does summer access limitations impact trail maintenance efforts?
What impacts do snowmobiles have on access of public right-of-ways for other uses?

Administrative

How will Department coordination with avalanche centers affect trail development?
How does Department coordination with land management agencies impact the program?
What is the impact of the Department's current strategy for distribution of funds?
How does the program ensure protection of the environment after grooming season ends?
How to accomplish MEPA compliance for individual grants?

Air Quality

How is air quality in town and along trails affected by snowmobiles?
How do air quality problems impact the sport of snowmobiling?

Cultural

What impact does snowmobiling have on the cultural, historical, or traditional value of an area?

Cumulative Effects

What are the cumulative effects of other winter recreational trail users?
What are the cumulative effects of industrial and commercial use of trails?
What are the cumulative effects of summer trail users?
What are the cumulative impacts to wildlife of hunting and other winter uses of trails?

Litter

What impact does the snowmobile program have on the dispersion of litter along trails?

Law Enforcement

What impact does the program have on law enforcement along trails?

Noise

What impacts do snowmobilers have on noise levels in town and on trails?

Private Property

What impact does the snowmobile program have on private property?

Soils

What impacts do snowmobiles have on stability of soils on and adjacent to trails?

Socio-economics

What impact does the snowmobile program have on the quality of life in Montana?

Table 1-1 continued

What are the impacts to local business communities from snowmobiling?
How is the general public affected through demands for local services?
How is the employment base affected by snowmobiling?
How are personal wages and benefits impacted by snowmobiling?
How is the State of Montana economy affected by snowmobiling?
What impact does the snowmobile program have on social well-being of communities?
What impact does the snowmobile program have on human safety?

Vegetation

What are the impacts to productivity and stability of vegetation communities, including wetlands along and adjacent to snowmobile trails?

Wildlife

What effect does the snowmobile program have on Elk, Moose, Whitetail Deer, Grizzly and Black Bears, Wolf, Fishers, Marten, Lynx, Wolverine, Boreal Owl, Northern Saw Whet Owl, Great Grey Owl, Northern Pygmy Owl, Woodland Caribou, Coyotes and Bighorn Sheep?

Source: 1992 project scoping meetings.

In addition to opportunities for comment during the scoping phase of this project, the public also had the opportunity to review and comment on the draft PEIS. The draft PEIS was published and released for public availability on March 30, 1993. The Notice of Availability was released in newspapers across the state providing information on where the draft PEIS could be reviewed, how to receive a copy of the draft PEIS, dates and locations for public hearings and the closing date for comments. Public hearings were held in Bozeman, Missoula, Kalispell, and Helena the week of April 26, 1993. Written comments were to be postmarked no later than April 30, 1993. No formal request for an extension of the review process was received under ARM 12.2.439. A number of comment letters were postmarked after April 30, 1993 and therefore were not formally responded to. However, in an effort to consider all concerns, the Department did review the late responses and concluded there were very few comments raised that were not already addressed by the Department in responding to timely letters. Transcripts of verbal testimony, written comments, and respective Department responses can be found in Appendix E of the final PEIS. Major concerns identified by the public focused on wildlife, non-motorized recreation areas, administration, and programmatic authority. Revisions and additions have been made to the text within this FPEIS to address these concerns where appropriate.

ASSOCIATED RULES AND REGULATIONS

The following rules and regulations are pertinent to the management of the Snowmobile Grant Program.

Executive Orders

37 F.R. 2877, Executive Order No. 11644, Use of Off-Road Vehicles on the Public Lands.

Establishes "policy and provides for procedures that will ensure that the use of off-road vehicles on public lands will be controlled and directed so as to protect the resources of those lands, to promote the safety of all users of those lands, and to minimize conflicts among the various users of those lands".

Montana Codes Annotated

Title 75, Chapter 1, Sections 101-1101
Montana Environmental Policy Act, (75-1-101 thru 1101, M.C.A).

Provides for the preparation of Environmental Impact Statements to disclose environmental impacts of activities involving the State of Montana.

Title 23, Chapter 2, Section 601-656
Montana Snowmobile Laws, (23-2-601 through 656, M.C.A).

Establishes regulations for the management of snowmobiling activities in Montana.

Title 60, Chapter 3, Section 201
Distribution and use of proceeds of gasoline dealers' license tax, (60-3-201,M.C.A)

Sets aside five-tenths of one percent of the Distributor's Gasoline Tax for development, operation and maintenance of public snowmobile facilities and for promoting snowmobile safety.

Title 70, Chapter 16, Section 302
Restriction on Liability of Landowners, (70-16-302, M.C.A)

Prior to each snowmobile season, club representatives meet with private landowners to communicate the safety measures being taken and to review with them their protection under this law.

Title 15, Chapter 31, Section 102
Organizations Exempt from Tax, (15-31-102, M.C.A).

To be protected under the Liability Immunity Law (27-1-732, M.C.A.), non-incorporated clubs often consider filing for the tax exempt status under this law.

Title 27, Chapter 1, Section 732
Immunity of nonprofit corporation officers, directors, and volunteers, (27-1-732, M.C.A).

Incorporated clubs are protected under this law whereby no officer, director or volunteer is individually liable for suit.

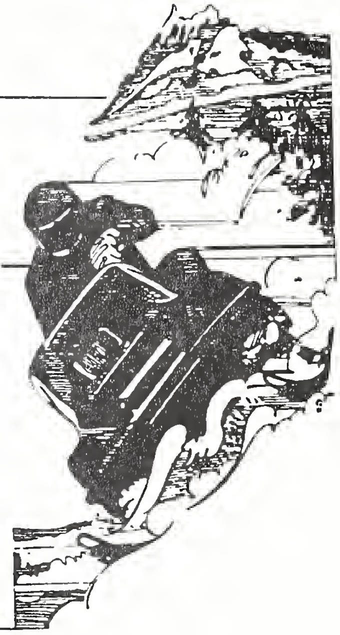
Administrative Rules of Montana

ARM 12.6.601-602 , Department of Fish, Wildlife and Parks, Administrative Rules.

ARM 12.2.428-453, Department of Fish, Wildlife and Parks, Administrative Rules Implementing MEPA.

ARM 26.3.133-160, Department of State Lands--Administrative Rules.

ARM 26.2.628 to 663, Department of State Lands--Administrative Rules Implementing MEPA.



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CURRENT PROGRAM, ALTERNATIVES & REASONABLY FORESEEABLE ACTIVITIES

This chapter summarizes three prospective actions that constitute the range of reasonable alternatives available to the Department regarding the Montana Snowmobile Grant Program. The first section of this chapter, *Development of Alternatives*, describes how the Department developed the range of alternatives presented and analyzed in this PEIS. The next three sections describe the three reasonable alternatives as identified by the Department following the scoping phase of this PEIS. Alternatives considered but withdrawn from further analysis in this PEIS are described in the next section, *Alternatives Considered but Dismissed in this PEIS*. The next two sections compare the alternatives and identify the Department's preferred alternative. The final section, *Reasonably Foreseeable Activities*, discusses activities that could affect the above alternatives in the reasonably foreseeable future. Subsequent chapters of this PEIS discuss the existing environment that might be affected by the alternatives, the direct, indirect and cumulative impacts of the Snowmobile Program coupled with past, present and reasonably foreseeable future activities.

DEVELOPMENT OF ALTERNATIVES

Before alternatives could be developed, the PEIS team identified ten issues (from the public and agency scoping process) to be used as indicators of potential significant adverse effects. These indicators (listed below) are used as criteria for evaluating and comparing alternatives. Cross references to these issues will be identified in the individual impacts discussions in Chapter 4.

- Issue 1--Concerns about gaps in the environmental review process, program administration and multi-agency coordination efforts
- Issue 2--Changes in air quality in recreation-based winter communities and along snowmobile trails
- Issue 3--Changes in topography, soil stability and hydrologic processes on and adjacent to snowmobile trails

- Issue 4--Changes in wildlife behavior, habitat and population distributions--particularly elk and grizzly bears
- Issue 5--Changes in productivity and stability of vegetation communities along and adjacent to snowmobile trails
- Issue 6--Changes in socioeconomic character of affected Montana communities--including business income, personal income, population, public services and social well-being
- Issue 7--Changes in unique cultural, historical, and traditional values of an area
- Issue 8--Changes in the level of safety and private property considerations in recreation based winter communities and along snowmobile trails
- Issue 9--Changes in the character of winter recreational communities, areas bordering designated wilderness areas, and opportunities for solitude and non-motorized recreation (aesthetics/access)
- Issue 10--Changes in aesthetic values along trails and in recreation based winter communities (noise, visuals, litter)

MEPA and NEPA require that the agencies evaluate the environmental effects of the "no change" alternative (current snowmobile program), and reasonable alternatives to the program. The Department is not preparing this PEIS in response to any proposal for change in the current program. However, the PEIS is being prepared to address alternatives to the existing program and identify the Department's preferred alternative. If, upon review of this document, an alternative other than the existing program is found to be preferable, the Department may elect to adopt that alternative as a basis for revising program management strategies.

A number of alternatives were identified and considered throughout this process. These alternatives were formulated in response to the environmental issues identified above. The intent of the alternatives is to address the issues and minimize the potential negative impacts through establishing modifications or conditions to the current program. Following is a detailed description of the three alternatives considered in this PEIS. These alternatives are evaluated in chapter four. A comparative summary of the analyses can be found in Chapter 4.

Alternative 1--No Change - Continue Snowmobile Grant Program as currently administered.

Alternative 2--Discontinue Snowmobile Grant Program.

Alternative 3--Continue Snowmobile Grant Program with modifications.

ALTERNATIVE 1--NO CHANGE

Under this alternative, the Montana Department of Fish, Wildlife and Parks would continue the program as currently administered. The environmental, social and economic conditions that currently exist as a result of the program would not change; current levels of administration and management efforts would be retained; and the application preparation and review processes would continue as identified below.

Program Management

Management of the Snowmobile Grant Program under Alternative 1 would continue as described in Chapter One. Under this management scenario, Department headquarters in Helena would retain overall policy development, program oversight and application review responsibilities. The Helena office would also be responsible for maintaining liability insurance covering activities on groomed trails, including organized rides and comprehensive collision insurance on state owned equipment. Regional offices would manage the program at the local and regional level. These responsibilities would include, but are not limited to, trail and equipment inspections, application assistance, facility inventories, management of grant funds, coordination with clubs, other land management agencies, and grant sponsors, and serving as the program liaison with Department Headquarters in Helena.

The Department's Conservation Education Division would retain its current duties in the fields of safety education, and awareness, while the Enforcement Division would continue implementing enforcement duties .

Application Process

The application process under Alternative 1 would require the same level of information and coordination as previous applications. On or about March 1 of each year the Department's Regional Parks Managers would provide application forms (Appendix B) and a list of federal and state land management agencies to snowmobile clubs and other parties interested in receiving funds for a snowmobile trail related project. With assistance available from the Regional Parks Manager, the applicant would be responsible for the preparation and submittal of the application by May 1 of that year. The Regional Parks Manager would review the application for completeness, and upon approval from the Regional Supervisor, deliver it to the statewide program coordinator in Helena by May 15. On or before July 1, the Montana Department of Fish, Wildlife and Parks' Snowmobile Advisory Committee would meet in Helena with the Statewide Trails Program Coordinator to review the applications and recommend project budgets for approval by the Director. Finally, on or before July 15 of each year, the Regional Parks Manager would notify the applicant of the final decision and budget.

Grant applications would be available for operation and maintenance projects and also for trail/facility development or expansion projects. Under Alternative 1, information requirements would be consistent with current levels of input as described below.

Operation and Maintenance Projects

Projects involving the operation and maintenance of existing trails would include grooming and signing activities. Grooming of trails could be proposed using three available equipment options. First, the applicant could propose that a qualified club volunteer, contractor or paid employee of the club use appropriate Department equipment. A complete Department equipment inventory can be found in Appendix C. Second, equipment that is available for use from other state agencies could be included in the proposal. These agencies may share in maintenance and operations costs, depending on the project. Third, in some areas, private contractors could be proposed to provide grooming services. This would allow for coverage of trail systems that may not have access to equipment leases from the state.

Under Alternative 1, grant applicants must provide a limited amount of information on their proposed grooming program. If the proposal were to include expanded grooming activities or grooming on a newly developed trail, the Department would prepare and submit a Regional Wildlife Clearance Form (Appendix B). This clearance form would then be reviewed by the Regional Wildlife Manager and the appropriate contacts (i.e. field biologists, Forest Service, etc.) would be made to adequately evaluate the impacts of the proposal. The wildlife manager may have a meeting with the club, other agency, the Regional Parks Manager, or other affected parties as needed. Alterations in the plan could be included to resolve any foreseen issues that develop during the review. Upon completion, the review would ultimately result in a project clearance or denial. The clearance provides for information on wildlife concerns, such as wildlife winter range and travel corridors and allows for identification of alternative routes by the applicant.

Other required information would include 1) a map of the trail system to be groomed, 2) written landowner permission, 3) types and numbers of equipment used (if leasing from Department), 4) anticipated number of miles to be groomed for the season (broken out by land management agency), 5) number of miles in trail system, 6) grooming season and frequency, 7) anticipated total number of users per trail, 8) certification of Workers Compensation for groomer operators, 9) Snowmobile Project Agreement between the Department and the club, 10) Multi-party agreement with other land management agencies and 11) cost estimates, including lease, operator, and repair costs.

Operation and maintenance projects may also consist of plans to begin or improve a signing and mapping program for the trail system. Under Alternative 1, information required for a signing and mapping program in the application would be limited to a description of signing and mapping needs for the season. Applicants would have access to the Regional Parks Manager and the Safety/Education Coordinator in Helena to assist in developing the appropriate needs.

In some cases, applicants may propose projects that include plowing of parking lots and access roads. If snowmobilers regularly access certain trail-heads in significant numbers, a plowing project can be proposed for lots or access roads associated with that trail head. Plowing is generally done by the Montana Department of Transportation or county road crews. Private individuals may also be hired or contracted to do plowing. Information requirements would include a plowing schedule and location map. Plowing arrangements with state or local agencies are typically made through the Regional Parks Manager who, upon application acceptance, would contact and establish an agreement with the appropriate agency.

If an operation/maintenance proposal were to call for expanded grooming or signing activities on previously unmaintained trails, the appropriate land management agency could have to complete an environmental review document. Under this scenario, the applicant would be required to submit the proposed plan of operations to the land management agency for review. If the agency was to determine that an environmental review was necessary, the applicant would be required to work with the Department and the land management agency to supply the necessary information for use in preparation of the document.

Trail and Facility Development/Expansion Projects

Grant applications for projects involving the construction of new, or the expansion of existing trails or facilities, such as parking lots, bridges, and shelters would require more detailed information than the operation and maintenance projects discussed above. Under Alternative 1, an applicant proposing new or expanded facilities would be required to submit design plans and appropriate permits that depict facility specifications such as widths of proposed trails and types of construction material. Estimates of project costs would be required, along with documented land-owner permission, trail maps, grooming plans (as identified above), certification of Workers Compensation and the Snowmobile Project Agreement. In addition, the applicant would be required to provide any information needed by the Department to complete the Wildlife Clearance Form as described above. The proposal would be reviewed by the Regional Wildlife Manager and a decision would be made to approve or deny the proposal's clearance.

If the proposed project included the construction or expansion of trails or facilities on property administered by a land management agency, preparation of an environmental review document by that agency could be required. Under this scenario, the applicant would be required to submit the proposal's plan of operation to the land management agency for review. If the agency was to determine that an environmental review was necessary, the applicant would be required to work with the Department and the land management agency to supply the necessary information for use in preparation of the review document. The document however, would only address the impacts of the proposal on the land managed by that agency and not land under the management of other agencies or private individuals. Upon completion of the environmental review and subsequent decision by the appropriate authority, the document would be submitted to the Department with the other information discussed above.

In order for a project to be considered, applications must meet the basic requirements as identified in Table 2-1.

For projects involving land management agencies, a signed Multiparty Agreement (Appendix B) would be necessary. To prepare the agreement, the club initiating its first snowmobile fund request would work with the land management agency. Procurement, completion and yearly updating (if necessary) of the multiparty agreement are the responsibilities of the applicant. Upon notification of budget approval, the grant recipient would submit requests of funds to the Regional Parks Manager. The Regional Parks Manager would then request a release of funds to the Department's Claims Section for disbursement to the recipients. The individual clubs would then be responsible for the management of funds in accordance with the agreements and conditions set forth in the application process.

ALTERNATIVE 2--DISCONTINUE PROGRAM WITH DFWP

Under this alternative, Department administration of the program would be discontinued by a legislative action and either eliminated entirely or assigned to another entity. It would be speculative and outside the scope of this PEIS to identify legislative intent under either of these scenarios. However, to analyze this alternative in the PEIS, it is assumed that the sport of snowmobiling would continue in Montana, albeit unregulated and without funding for established trail systems.

Table 2-1 Application Requirements	Operation and Maintenance Projects	Trail or Facility Development/ Expansion Projects
Written landowner permission	X	X
Assurance that project complies with FS Travel Plans and/or BLM Land Unit Plans	X	X
Maps depicting areas to be groomed or plowed, new proposed trail systems or proposed expansion trails	X	X
Facility design plans		X
Cost estimates.	X	X
Volunteer efforts, matching funds certification of workers compensation.	X	X
The number of miles of trails to be groomed.	X	
Equipment needs.	X	
Environmental document, if necessary, from appropriate land management agency (BLM, FS).		X
Trail or facility design plans and location maps.	X	X
Multi-party and snowmobile project agreements.	X	X

ALTERNATIVE 3--CONTINUE CURRENT PROGRAM WITH MODIFICATIONS

The Department would modify the current program to include measures designed to reduce or eliminate negative environmental consequences identified in the analysis of the current program (Alternative 1). Modifications would typically be achieved through an aggressive signing and public awareness program. The following sections describe the impacts and subsequent modifications for each significant issue identified at the beginning of this chapter. All or some of the following modifications could be chosen by the Department in developing a management strategy based on this alternative. All other aspects of the snowmobile grant program under Alternative 3 **would remain as described in Alternative 1**. Current Department policy regarding the management of the Snowmobile Grant Program would need to be changed in order to implement the mitigations identified below.

Incorporating the following modifications into the program under Alternative 3 would require that applicants prepare and submit additional information as necessary in order for the Department to review the proposals and adequately determine compliance with program goals, environmental regulations and funding capabilities. Additional information requirements are addressed below following discussions of each modification. This information would typically be provided within the context of the applicant's *Plan of Operations*. This plan would be very similar in content to the existing program's application but would include the additional information as described below. Regional Parks Managers would be available to provide assistance in gathering the additional data to be submitted.

If an environmental document prepared by a land management agency already exists for a given trail, the applicant must submit to the Department the decision document and a copy of the environmental document along with the application materials.

Issue 1 -- *Concerns about gaps in the environmental review process, program administration and multiagency coordination efforts.*

Proposed Modifications

Mandatory Environmental Review. With the exception of projects classified as categorical exclusions as identified in Appendix A, an environmental review document would be completed by the Department for each grant application. The review document would be written based on information provided by the applicant and would address appropriate mitigations as identified in the discussion of issues 2-8 below. If additional information were to be needed to complete the review, the Department would notify the applicant and identify the needs. The environmental review document would place an emphasis on those portions of the proposed action not already covered under the environmental review process of a land management agency. The environmental document would take one of three forms: an Environmental Checklist; Environmental Assessment; or Environmental Impact Statement.

> *Environmental Checklist*--An Environmental Checklist (EC) would be prepared on all proposals and would be based on the environmental review criteria identified in Appendix A. The EC would serve as the sole environmental document in cases where a majority of the proposed action is addressed in a land management EA, or involves only operation and maintenance type activities.
>
> *Environmental Assessment*--An Environmental Assessment (EA) would be prepared on proposals that include the development of new trails or facilities that are not already considered in an environmental review. The EA would be prepared by the Department and would "tier" or draw from impacts identified in the land management EA and this Programmatic EIS, as well as site specific analysis if needed.
>
> *Environmental Impact Statement*--If the Department were to identify impacts determined to be significant, an EIS would be prepared to meet the requirements set forth by MEPA.

Restructured Advisory Committee. The formal application review committee and associated procedures would be restructured to include representation from appropriate land management agencies, including the Department of State Lands, the U.S. Forest Service, the Bureau of Land Management, and at least one member of the general public not directly associated with the Snowmobile Program. The review team would coordinate reviews to ensure that all issues of potential concern for each agency (i.e. lease agreements, enforcement jurisdictions, avalanche safety, etc.) and the public would be covered in a comprehensive and efficient manner.

Information requirements

- o Decision memo and environmental document prepared by a land management agency
- o Map identifying proposed trails or facilities on lands not managed by a land management agency
- o Permits, licenses, and clearances from other agencies
- o Information required under modifications listed below (2-9) that are pertinent to the project

Issue 2 -- *Changes in air quality in recreation based winter communities and along snowmobile trails.*

Proposed Modifications

System expansion. As trail use densities increase over the years, proposals for expanded trails systems would allow for temporary dispersement of snowmobile densities. Increasing individual system networks and linking systems would bring trail use densities down in the short term.

Industry reform. Grant recipients could work with public agencies and MSA representatives to encourage research and development of new technologies aimed at reducing snowmobile emissions and improving standards.

Education. The applicant would work with the Department to establish a public awareness program designed to inform snowmobilers of the negative impacts that cold starts, old model snowmobiles and past-due tune-ups have on community air quality.

Information requirements

- o Location maps identifying proposed trail expansions and alternatives
- o Public awareness plan, including sign descriptions, workshop descriptions (i.e. public service announcements, news releases, informational billboards on primary access highways, general snowmobile maintenance, performance enhancing techniques, community pollution minimization, etc.)

- Statement of support and identification of club member assigned for representation to Industry and Legislative Reform Committee

Issue 3 - - *Changes in topography, soil stability and hydrologic processes on and adjacent to snowmobile trails.*

Proposed Modifications

Avoidance/seasonal restriction. Trails proposed in areas that receive little or no snowcover during the early and late snowmobile season would require a shortened grooming season and restricted access during those periods. Avoidance areas would be signed, trails would be staked off with warning poles (i.e. similar to those used in ski areas), and access limitation would be enforced.

Areas that are characterized by a domination of wet meadows in the summer, would be off-limits to proposed snowmobile trails from April 1 to December 1, unless traversed by existing roads. Proposals would include trails around the periphery of wet meadow areas, and signing would be proposed to discourage off-trail riding through these areas during early and late seasons.

If proposed trails necessarily cross areas characterized by wet meadows, early and late season grooming and access would be restricted. Avoidance areas would be signed, staked with warning poles, and access limitations would be enforced.

Alternative proposals to cross streams that don't have existing bridge structures would be required. Avoidance of damage caused by damming of runoff behind compacted snow crossings would be achieved by realigning the proposed trail to crossings with existing structures.

Stream crossings. Proposals would include bridges, structures and fords designed in cooperation with the Department and land management agency, with safeguards to ensure against damage caused by installation.

Education. The applicant would work with the Department and land management agency to establish an awareness program that would detail the variable nature of soils and identify means of avoiding adverse impacts as well as consequences for violations. The awareness program could include such strategies as 1) interpretive signing along trails, 2) short write-ups on trail maps and other brochures, 3) presentations at club and association meetings, 4) distribution of flyers in local communities, or 5) information officers on trails.

Information requirements

- Trail maps identifying portions of trails with minimal snowcover during the early and late snowmobiling seasons and identifying summer wet meadow areas
- Trail maps identifying proposed trails and alternative routes for avoidance of areas with minimal snowcover

- Descriptions of specific measures to be taken to ensure compliance with avoidance and seasonal limitation policies as established under Alternative 3. (i.e. alternative routes, seasonal restrictions for snowmobiles and grooming activities and associated signing strategies)
- Signing plan and requirements for limited access areas identified on the trail maps as having insufficient snow for early and late season grooming and snowmobiling
- Signing plans and requirements for restricted areas identified on the trail maps as summer wet meadows. Signs should encourage snowmobilers to remain on trails through these areas.
- Bridge, structure, and ford design specifications for proposals requiring construction of temporary or permanent structures
- Public awareness plan, including signing, brochures and workshop descriptions (i.e. interpretive signs, sensitive soils awareness, support for avoidance, seasonal adjustment and stream crossing policies)
- Alternatives for designating variable altitude snowmobile "trailheads" dependent upon snowcover

Issue 4 -- *Changes in wildlife behavior, habitat and population distributions, particularly elk and grizzly bears.*

Proposed Modifications

Several measures are available to the agencies that are designed to protect habitat and preserve natural behavioral traits and population distributions. The measures are designed to reduce impacts from the establishment of trails under the Snowmobile Grant Program. Most of the following mitigating measures would be accomplished through a strategic signing, education and enforcement program.

Clearance Oversight. The wildlife clearance process, as required under Alternative 1, would be prepared by the Regional Wildlife Manager. In addition, the clearance and the information submitted by the applicant would be forwarded to the review committee for concurrence.

Avoidance. Trails in the vicinity of ungulate wintering areas should be avoided. If trails are necessarily proposed near such areas, their location and design should be such that animal stress or energy expenditures would be kept at minimum levels. Trail design and subsequent development would be limited to avoid wintering areas as much as possible, with trails located to utilize cover of vegetative shields. Visual enjoyment of wintering ungulates would be retained by designing pull-offs at key, but unobtrusive, observation points adjacent to wintering areas. Periphery trails would be limited to the minimum distances necessary to bypass the wintering area. The remainder of the periphery would be off limits to trail development in order to provide available cover for ungulates.

Seasonal restrictions. Trails proposed in the immediate or adjacent vicinity of ungulate wintering areas located in grizzly bear spring range, known grizzly bear denning areas, and bald eagle nesting areas would be restricted seasonally and designed under the avoidance criteria established above. Seasonal restriction would be applied to such trails as determined necessary by site-specific NEPA/MEPA analysis. This would ensure minimal disturbance to denning and emerging bears as well as nesting bald eagles.

Signing. Signing would be required encouraging snowmobilers to "Stay on Trail--Stay on Machine" through environmentally sensitive areas.

Enforcement. The Department will increase law enforcement efforts on trails to improve compliance with applicable regulations. The Department will work cooperatively with other law enforcement officials to improve compliance. Voluntary compliance with stipulations will be monitored by the Department. In instances when a law enforcement report identifies repeated trespass/encroachment of restricted areas (and/or associated harassment of wildlife) caused by a nearby funded trail, a proposal will be included to correct the problem. Options could include informational trail signs, concentrated law enforcement efforts in the area, cooperative enforcement with managing agency/jurisdiction law enforcement personnel, increased funds from the Grant Program for problem area law enforcement, or termination of grant funds for specific problem trail.

Education. As with the other disciplines, the applicant would work with the Department and land management agency to establish an awareness program that would detail the sensitive nature of wildlife and habitat and would identify means of avoiding adverse impacts as well as consequences for violations. The awareness program could include such strategies as 1) interpretive signing along trails, 2) short write-ups on trail maps and other brochures, 3) presentations at club and association meetings, 4) informational billboards on primary access highways, 5) distribution of flyers in local communities, or 6) information officers on trails.

Information requirements

- Trail maps identifying trails, type of activity (i.e. operation and maintenance, construction, etc.), and alternative trails in compliance with avoidance policy
- Trail specifications, including widths, pullout and cut-and-fill locations etc.
- Identification of big game wintering areas and description of specific measures to comply with avoidance policy as established under Alternative 3 (i.e. alternative routes, utilization of vegetative shields, etc.)
- Identification of potential grizzly bear habitat in ungulate wintering areas; also description of specific measures to comply with restricted area/timing policy as established under Alternative 3 (i.e. alternative routes, seasonal restrictions and associated signing, etc.)
- Public awareness plan, including signing, brochures and workshop descriptions (i.e. interpretive signs, wildlife sensitivity awareness, harassment laws, support for avoidance, restriction and idle zone policies)

Issue 5 -- *Changes in productivity and stability of vegetation communities along and adjacent to snowmobile trails*

Proposed Modifications

Avoidance/seasonal restrictions. In areas of known sensitive vegetation, such as wetlands and alpine tundra, proposed trails would be located so as to avoid physical disturbance of the vegetation during construction of the trail and during maintenance and operation periods. Avoidance routes would be located away from sensitive vegetation and segments prone to minimal snow depth and accumulation. Areas receiving minimal snow depth and accumulation would include such areas as south facing slopes or wind-swept plateaus. Land management agencies and the Natural Heritage Program have information on locations of sensitive, rare or endangered species in Montana.

If proposed trails would necessarily cross areas of known sensitive vegetation, early and late season grooming and access would be restricted. Avoidance areas would be signed, trails would be staked off with warning poles (i.e. similar to those used in ski areas)and access limitations would be enforced.

Routing of trails around ungulate wintering areas, as discussed under Issue 1, would be necessary to avoid the possible displacement of animals and the exceedence of habitat carrying capacities by the over-utilization of forage sources in localized areas away from trails.

Monitoring. Snowmobile trails and staging areas would be monitored yearly for the spread of noxious weeds. In areas identified as being affected by noxious weeds, a cooperative weed control program would be implemented and alternative routes would be established to reduce the spread of weeds in the affected area.

Utilize existing roads. Establishment of trails on existing roadways that have prepared roadbeds (i.e. Forest Service access roads, logging roads, closed county roads, etc.) and limited vegetation cover would be preferred unless none existed in the proposed area. Where no existing roads can be utilized, the proposal would be required to implement avoidance and monitoring procedures as identified above.

Education. The applicant would work with the Department and land management agency to establish an awareness program detailing prevention methods for the spread of noxious weeds, explaining the sensitive nature of vegetation, and identifying means of avoiding adverse impacts as well as consequences of violations. The awareness program could include such strategies as 1) interpretive signing along trails, 2) short write-ups on trail maps and other brochures, 3) presentations at club and association meetings, 4) distribution of flyers in local communities, or 5) information officers on trails.

Information requirements

o Trail maps identifying proposed trails, type of activity proposed, and proof that existing roads or trails were utilized where possible

- Identification of areas known to have sensitive vegetation such as wetlands and alpine tundra, and description of measures to comply with avoidance policy as established in Alternative 3 (i.e. alternative routes and associated signing)
- Identification of areas on proposed trails known to have insufficient snow depths early and late in the snowmobile season and a description of measures to comply with avoidance and seasonal limitation policy as established in Alternative 3 (i.e. alternative routes, seasonal restrictions for snowmobiles and grooming activities and associated signing strategies)
- Monitoring plan identifying what will be done to monitor for introduction or spread of noxious weeds along constructed snowmobile trails as well as plans for remediation of any that appear
- Public awareness plan, including signing, brochures and workshop descriptions (i.e. interpretive signs, vegetation sensitivity awareness, support for avoidance and restriction policies, etc.)

Issue 6 -- *Changes in socioeconomic character of affected Montana communities, including business income, personal income, population, public services, and social well-being.*

Proposed Modifications

Planning. Promotional agendas and events sponsored by the grant recipient would be organized with local economic interests to ensure representation by concerned interests. Schedules would be arranged to best meet community interests and ensure equitable economic benefits.

Information requirements

- Preliminary plans for promotional and organized events that will utilize the funded snowmobile trail system
- Permits necessary for the events
- Design plans and projected employment requirements for proposed facilities that involve contracted services (i.e. construction of parking lot, new trail or restroom facilities, grooming services, etc.)

Issue 7 -- *Changes in unique cultural, historical, and traditional values of an area.*

Proposed Modifications

Avoidance. Known archaeological sites would be avoided by proposing trails which would be taken far enough away from the site to ensure minimization of disturbance from direct and associated actions. In some cases, proposals would include routes or reroutes at a distance far enough to minimize auditory or visual intrusions. This would be accomplished by utilizing topographic features between the trail and the site.

Site-specific treatments. Proposed trails on land management agency property such as Forest Service and BLM must comply with cultural resource laws as described in Appendix D. In most cases a cultural resource compliance structure is in place and utilized as part of the agencies review of the plan of operations. In instances involving private land or when dealing with agencies without an established compliance structure, the applicant would have to meet the requirements of cultural resource laws independently, and prepare site specific treatments as requested by the Department.

Education. The awareness program could include such strategies as 1) interpretive signing along trails, 2) short write-ups on trail maps and other brochures, 3) presentations at club and association meetings, 4) distribution of flyers in local communities, or 5) information officers on trails.

- Trail maps identifying proposed trails, type of activity, and alternative routes
- Identification of known cultural resources along existing trails or on proposed new trails, and a description of measures to comply with avoidance policy as established in Alternative 3 (i.e. alternative routes and associated signing)
- Results of cultural resource evaluation prepared for proposed trails, if determined necessary by the Department
- Public awareness plan, including interpretive signs, caution signs, brochures and workshop descriptions (i.e. interpretive signs, cultural site sensitivity, vegetation sensitivity awareness, support for avoidance and restriction policies, etc.), and appropriate "stay on trail-stay on machine" signing

Issue 8 -- *Changes in the level of safety and private property considerations in recreation based winter communities and along snowmobile trails. (law enforcement)*

Proposed Modifications

Signing. Signing strategies would be established to warn snowmobilers of upcoming safety hazards such as switchbacks, trail and highway intersections, narrow trails, etc., and acknowledging traffic regulations on existing roads applicable to all vehicles.

Enforcement. The Department will increase law enforcement efforts on trails to improve compliance with applicable regulations. The Department will work cooperatively with other law enforcement officials to improve compliance. Voluntary compliance with stipulations will be monitored by the Department. In instances when a law enforcement report identifies repeated trespass/encroachment of private lands, wilderness area(s) or restricted areas caused by a nearby funded trail, a proposal will be included to correct the problem. Options could include informational trail signs, concentrated law enforcement efforts in the area, cooperative enforcement with managing agency/jurisdiction law enforcement personnel, increased funds from the grant program for problem area law enforcement, or termination of grant funds for specific problem trail.

Education. The applicant would work with the Department and land management agency to establish an awareness program, detailing the importance of caution and trespass restrictions along trails and through recreation based winter communities. The awareness program could include such strategies as 1) "Stay on Trail" signs, 2) short write-ups on trail maps and other brochures, 3) presentations at club and association meetings, 4) distribution of flyers in local communities, or 5) information officers on trails.

Information requirements

- Trail maps identifying portions of trails considered as safety concerns (i.e. trail intersections, highway intersections, switchbacks, limited sight distance, etc.), and alternatives that would allow for avoidance of such areas
- Trail maps identifying private property along trails that is susceptible to encroachment by snowmobiles (i.e. corner lots, areas near parking lots, areas between trails within close proximity to each other, etc.) and alternatives that would allow for avoidance of such areas
- Signing plan including: specific requirements for informational, regulatory, and caution signs in areas identified on the trail maps as being areas of safety concerns; specific strategies for keeping snowmobile activity off of private property
- Public awareness plan, including brochures, meeting notices, and informational signing

Issue 9 -- *Changes in the character of winter recreational communities, areas bordering designated wilderness areas, and opportunities for solitude and non-motorized recreation resulting from access availability.*

Proposed Modifications

Trail location strategies. All plans for new trails would be designed to avoid or compliment existing cross-country ski trails, wilderness areas, designated non-motorized areas, congressionally designated wilderness study areas, and areas known to be popular non-motorized recreation areas. If ski clubs were to have existing trails, the project proponent would coordinate trail planning efforts with representatives from the ski club to design snowmobile trails at reasonable distances from, or to compliment, existing ski trails or areas.

Signing. Signing strategies would be established to warn snowmobilers of shared use areas or intersections with popular cross-country ski trails. Signs would also be established on trails that necessarily pass near wilderness boundaries, designated non-motorized areas, and congressionally designated wilderness study areas. Such signs would inform users of boundary locations and request snowmobilers remain on the groomed trails.

Hourly restrictions. Proposed trails near sensitive areas, such as residential neighborhoods and winter campgrounds, would require access limitations during the evening hours. Residents and emergency traffic would be permitted; whereas, primary routes leading to and from communities would be exempt from such limitations. Areas with enforced hourly restrictions would be identified by appropriate signs and highlighted on snowmobile trail maps.

Public awareness. Grant recipients would prepare public awareness strategies to improve sensitivity to safety concerns along shared use trails and the impacts of snowmobiles in the vicinity of non-motorized recreation and sensitive residential areas.

Enforcement. The Department will increase law enforcement efforts on trails to improve compliance with applicable regulations. The Department will work cooperatively with other law enforcement officials to improve compliance. Voluntary compliance with stipulations will be monitored by the Department. In instances when a law enforcement report identifies repeated trespass/encroachment of private lands, wilderness area(s) or restricted areas caused by a nearby funded trail, a proposal will be included to correct the problem. Options could include informational trail signs, concentrated law enforcement efforts in the area, cooperative enforcement with managing agency/jurisdiction law enforcement personnel, increased funds from the Grant Program for problem area law enforcement, or termination of grant funds for specific problem trail.

Industry reform. Grant recipients would work with public agencies and MSA representatives to encourage industry research and development of new technologies for reducing snowmobile noise levels and improving standards.

Information requirements

- Trail maps submitted with application that identify existing cross country ski trails, wilderness areas, congressionally designated wilderness study areas and designated non-motorized area
- Proposed snowmobile trails with avoidance strategies implemented--including identification of alternative routes
- Signing plan identifying signs to be used in areas of historic conflict with non-motorized recreationists. Signing plan would also be used to identify "idle zones" and hourly travel restrictions near sensitive areas
- Statement of support and identification of club member assigned for representation to Industry Reform Committee
- Public awareness plan, including brochures, meeting notices, and informational signing

Issue 10 -- *Changes in aesthetic values along trails and in recreation based winter communities. (litter,noise,visuals)*

Proposed Modifications

Trail location strategies. Information would be required in the application providing detailed design specifications and an outline of proposed steps to minimize impacts on visual resources.

Specific design guidelines incorporated into the plans of operation would include the development and usage of trails that utilize vegetative screening as much as possible and the avoidance of ridge lines, open meadows, and exposed slopes when possible. Trail routes would be designed to avoid key non-motorized recreation areas.

Trash receptacles. Proposals would include provisions for placement of trash receptacles at trail heads and/or appropriate signing, public awareness, and maintenance responsibilities where appropriate and in accordance with management agency policy.

Enforcement. Law enforcement efforts would be increased to encourage trail users to avoid areas such as designated ski routes, wilderness areas, designated non-motorized areas and congressionally designated wilderness study areas. Enforcement efforts would target stock and modified machines that surpass maximum state sound levels. Voluntary compliance with stipulations will be monitored by the Department with the option of discontinuing funding or trail closures in repeat non-compliance cases.

Public awareness. A public awareness program directed at community residents and snowmobilers would be implemented to emphasize the importance of reducing degrading air emissions. The program would emphasize such actions as 1) limiting cold starts by storing machines in warm storage facilities, when possible, 2) spending less time in town with engines idling before leaving for trails, 3) keeping machines tuned properly, and 4) issuing inversion warnings to increase awareness of climatic conditions that lead to air quality and visibility problems. Public awareness programs would also be established to educate the public on proper maintenance of snowmobiles and impacts of elevated noise levels on humans and animals.

Industry reform. Grant recipients would work with public agencies and MSA representatives to encourage industry research and development of new technologies aimed at reducing emissions.

Information requirements

- Proposals would include descriptions of efforts made to limit intrusions into areas that are highly visible from surrounding areas (i.e. ridge lines, open meadows and exposed slopes), including identification of alternative routes
- Plans identifying specific locations of trash receptacles and/or "pack it in - pack it out" type signing strategy
- Public awareness plan
- Statement of support and identification of club member assigned for representation to Industry and Legislative Reform Committee

Under Alternative 3, the Regional Parks Manager would review the application materials submitted by the applicant using the environmental review criteria (Appendix A) as a guide to ensure a complete application. Any additional information requirements would be requested by the Parks Manager at that time. An environmental review document (checklist EA, EA or EIS) would then be prepared and submitted with the application materials to the Department review committee for final review and recommendations.

The applicant would receive a copy of the environmental review criteria with the application materials provided by the Department. Based on the program modifications described above, the criteria would provide the applicant with guidance in preparation of the application and plan of operations.

OTHER ALTERNATIVES CONSIDERED

The following alternatives were identified in the scoping process and considered by the Department during the preparation of this PEIS, but were eliminated from detailed analysis.

Increased funding to program for system expansion.

> This alternative was considered but dismissed from further analysis because it was determined to be out of the scope of this PEIS. Increased funding would require legislative approval and modifications to the law. It is impossible to determine what funds would be changed and by how much, thereby making it difficult to assess impacts based on system expansion. In addition, most impacts resulting from expanded trail systems will be addressed in this PEIS, as it considers the impact of new or expanded trails. Consideration of funding for non-motorized trails programs is beyond the scope of this PEIS.

Amend laws to place the burden of funding on in-state and out-of-state snowmobilers.

> This alternative was considered and dismissed because existing laws mandate that funding from Montana's Distributor Gasoline Tax be used to fund the Snowmobile Grant Program. The level of funding (five-tenths of one percent) was established, using a formula that calculates the percentage of gasoline used by the snowmobiling public.

Continue snowmobile program but provide more equitable funding for all recreation trails in Montana.

> This alternative was considered but dismissed from further analysis because it was determined to be out of the scope of this PEIS. Reallocation of funds currently earmarked for the Snowmobile Grant Program would require legislative changes.
> Without knowing what those particular changes would be, it is very difficult to assess the environmental impacts associated with the various funding scenarios.

Zero subsidy: Funding should be allocated to programs establishing zoning systems with motorized/non-motorized areas designated and mandatory fines for violations--stepped up law enforcement.

> This alternative was dismissed from analysis because laws providing for the establishment of motorized and non-motorized areas already exist as well as a penalty structure for levying fines on offenders. Stepped up law enforcement is not considered as an alternative in this PEIS but is addressed as a mitigation to many of the issues identified by the public.

COMPARISON OF ALTERNATIVES

Chapter four (table 4-2)provides a ***complete*** discussion of impact comparisons by discipline, for each alternative summarized below.

> **Alternative 1**(current program): Under this alternative, moderate impacts could occur to certain aspects of administration, air quality, roads and trails on public lands, wildlife, vegetation, social, and cultural resources.
>
> **Alternative 2** (discontinued program): Under this alternative, moderate impacts could occur to certain aspects of administrative, air quality, wildlife, vegetation, economic, social, cultural, visual, noise, and recreation resources.
>
> Certain aspects of wildlife (ungulate and grizzly) resources may sustain major impacts in the long term.
>
> **Alternative 3** (modified program): No resources would sustain more than minor impacts in the short and long terms.

AGENCY'S PREFERRED ALTERNATIVE

Upon comparison of the impacts under each alternative and review of the findings in this PEIS, the Department has selected Alternative 3 as the agency's preferred alternative. Alternative 3 best meets the Department's statutory mission and responsibilities under 23-2-601 to 654, M.C.A., and ARM 12.6.601 to 602.

REASONABLY FORESEEABLE ACTIVITIES

Connected Systems

The majority of trails that are currently funded and groomed under the Grant Program are clustered and range in length from 58 to 300 miles. In many cases, gaps ranging from five to thirty miles separate these trails. The potential exists for the establishment of a "system" of interlinking trails that would connect the smaller, more local trail systems. Existing roadways and travel routes could be the mechanism for these linkages. The total number and miles of groomed trails could increase. For such a "system" of interlinking trails to be established, the Department would coordinate closely with federal, state and local agencies as well as private entities.

High quality snowmobile trail programs presently exist in Montana's neighboring states of Idaho and Wyoming. These systems are within close proximity to Montana trails with only short distances separating them. Support is increasing for the establishment of a link between the Montana trail system and these neighboring systems. These efforts will again require significant planning between federal, state, and local agencies as well as private entities.

Training

The Department will be initiating a more aggressive program of snowmobile safety training, with emphasis on avalanche awareness and avoidance. The Department will continue to support and promote the USFS avalanche forecast centers throughout the state. This includes a cooperative effort for increased avalanche awareness training for all winter recreationists. Snowmobile safety will also be improved through the development of a guide to be used in more structured classroom environments.

Signing

In the past, trail signing guidance has varied among federal, state and local jurisdictions. There is also a need for increased training for individuals and agencies involved in signing. A recent report conducted by the USFS, in cooperation with the International Association of Snowmobile Administrators, reviews existing signing and signing needs across the country. The report, *National Forest Snowmobile Sign Guidelines*, will provide a mechanism for signing consistency in Montana and elsewhere. The Department and the Northern Region of the USFS are working to establish uniform signing throughout the snowmobile trail program. Appropriate trail signing training will be provided at annual meetings and to regions and clubs. Signs will be distributed to trail sponsors as needed.

Implementation of an interdiscplinary program of ecosystem interpretive and *Watchable Wildlife* signs on snowmobile trails will be initiated. This program will not only inform trail users of wildlife species and their winter needs and stresses, but will also interpret plant, geologic, ecosystem, historic and cultural features. This signing will become an integral part of trail-head and trail-side facilities.

Law Enforcement

The Department will work cooperatively with other agencies to increase appropriate enforcement activities in the areas of registration compliance, DUI and wilderness/restricted area encroachment. The enforcement of all snowmobile laws will be a shared responsibility with the sheriffs and their deputies of the various counties of the state, the Montana Highway Patrol, authorized officers of the department, and the police of each municipality. Enforcement will be extended to all of the designated public snowmobile trails and areas. The 1993 session of the Montana Legislature increased the snowmobile registration decal fee from $2.00 to $5.00 per year, in part to increase funding for law enforcement. $2.50 from each registration decal sold, or approximately $35,000 per year, will be invested in law enforcement. In addition to the registration fee increase, if the Department sees a need for increased funding for law enforcement, options for consideration could include: 1) increased non-resident permit fee (temporary decal fee), 2) Montana decal fee for non-residents, 3) use portion of funds previously dedicated to grants, and 4) increase penalty fees for violations, etc..

Accident Monitoring

Only a small percentage of total accidents on snowmobile trails are reported. Legislation may be introduced that would require reporting of all accidents which occur on snowmobile trails involving personal injury or property damage exceeding $750.00. This would allow the Department to analyze accident causes and utilize that information in the design of safety training and analysis of trail design.

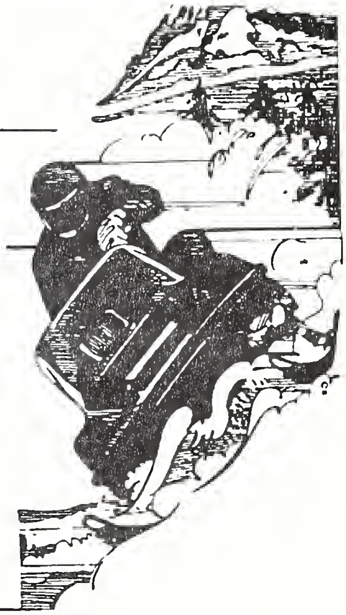
Administration

Increased funding and personnel will be necessary, not only to maintain the existing program, but also to make improvements in the project review process, on-ground facilities and law enforcement. A more comprehensive project review process will require increased administrative funds, which will decrease funds available for other program aspects.

At the present time, there are only enough funds to replace one piece of grooming equipment per year. The present size of the program demands the replacement of two or three machines per year. These items are necessary to provide the safest and highest quality riding experience for snowmobilers.

To meet these needs, the Department anticipates support for an increase in the cost of snowmobile registration decals (see discussions under Law Enforcement--page 34). For each dollar increase in the decal fee, 50% would go to the trail program and 50% to law enforcement.

Any increase in the state gas tax could yield additional funds to the snowmobile program under 60-3-201(1)(5), M.C.A.



3

AFFECTED ENVIRONMENT

Because this is a Programmatic EIS rather than a project or site specific EIS, the following descriptions of the affected environment will address conditions in a regional context rather than site specific. The Department is aware that Montana is a very diverse state in terms of its environmental, human, political and economic characteristics. Every attempt has been made to describe these diversities as they relate to the impact analyses in Chapter 4.

ADMINISTRATION

Current administration of the Snowmobile Grant Program is detailed in Chapter 1 under Agency Responsibilities, and Chapter 2 under discussions of Alternative 1.

AIR QUALITY

Montana has extreme variations in climate and topography across its land area. Elevations range from 1,800 feet above mean sea level (m.s.l) in the northwest corner of the State to 12,799 feet at Granite Peak near Yellowstone Park. One-half of the State land area is over 4,000 feet above m.s.l. The western one-half of the State is mountainous, whereas the eastern half is much like the Great Plains country. The Continental Divide traverses the western half of the State in roughly a north-south line. To the west of the Divide, the rivers and creeks ultimately drain to the Columbia River and the Pacific Ocean. To the east of the Divide, the rivers drain to the east into the Missouri River, with a small portion of the northern section of the state draining to the north into the St. Mary River, and eventually to the Hudson Bay.

The Continental Divide significantly affects the climate of the State. West of the Divide, the climate might be described as modified North Pacific Coast. East of the Divide the climate is continental. The area west of the Divide, as compared to east of the Divide, has generally more mild winters, precipitation is more evenly distributed throughout the year, summers are cooler, and winds are lighter. The west is more cloudy in all seasons, humidities are higher, and the growing season is typically shorter.

The predominant wind direction statewide is westerly. Average wind speeds west of the Divide tend to be lower than those east of the Divide. The areas just east of the Divide often experience much stronger winds due to downslope winds or "chinooks." Much of the State experiences temperature inversions caused either by large anti-cyclones (high pressure systems) or by nocturnal cooling of the ground and the air near the surface. When the inversions become pronounced and remain over several days due to snow cover and light wind speeds, the areas can experience significant fog and trapping of air pollutants. The major valleys west of the Divide and many valleys in the southwest portion of the State, east of the Divide, are primarily orientated in a north-south direction. When inversions form in these valleys, because of the north-south orientation, the valleys' walls act to block any winds that could disturb the inversions and disperse air pollutants. Temperature inversions can occur in Montana during every month of the year; however, the more intense and longer duration inversions occur during periods of snow cover and limited sunlight, i.e. the late autumn and winter.

Montana experiences wide variations in the amount and timing of its annual precipitation. The variation is a result of elevation differences, location, and proximity to topographic features. Areas adjacent to mountain ranges are typically the wettest, unless these areas are downwind of the mountains and occur within the rain shadow. Nearly half of the annual precipitation falls in the period of May through July. The driest region of the State is the north-central whereas the wettest areas are west of the Divide. Annual snowfall varies from 300 inches in some mountainous areas west of the Divide, to around 20 inches in some areas east of the Divide. Most snow falls during the November to March period, but heavy snow falls can occur as early as mid-September or as late as May (Cordell, 1971).

Montana's air quality is very good, with the exception of a few urban-industrial areas. A few areas of Montana are classified by the Montana Department of Health and Environmental Sciences Air Quality Bureau as nonattainment areas or areas presently not meeting the ambient air quality standards. Several of these have been designated as nonattainment areas because of sulfur dioxide and carbon monoxide. The sulfur dioxide nonattainment areas are impacted by refineries, power plants, and smelters. The carbon monoxide nonattainment areas are related to larger population areas such as Missoula, Billings, and Great Falls. For particulate matter, the ambient standards are based on the amount of fine particulate suspended in the air. The standard is for 10 micron or smaller particle (PM-10). Under the classification of the areas of the State regarding the PM-10 standard, each area is designated as to the probability that the PM-10 standard will be or is being exceeded. The classifications are 1) Group I (greater than a 95 percent probability of exceeding the standards), 2) Group II (20 to 95 percent probability of exceeding the standards), and 3) Group III (less than 20 percent probability of exceeding the standards). A number of towns west of the Divide have been designated as Group I with most of these towns located in the west and northwest portion of the state. With the exception of several more towns in western Montana designated as Group II, the remainder of the state is designated as Group III. The primary causes for the Group I or II designation for PM-10 particulates is due to vehicle traffic, wood smoke, and industry (Davidson, 1991).

In addition to the designated nonattainment areas, various areas of the state are designated with regard to the amount of air quality degradation that is permitted. The designations are under the Prevention of Significant Deterioration (PSD) and are 1) Class I (little or no degradation allowed), 2) Class II (moderate growth and degradation), and 3) Class III (degradation of the air quality permitted up to the ambient air quality standards). Most of the wilderness areas, some Indian reservations, and national parks are designated as Class I areas. The remainder of the State is designated as Class II. There are presently no Class III areas in Montana. The PSD designation refers primarily to degradation due to major industrial sources; however, the Class

I designation can restrict other developments near these areas that could affect the air quality.

The air quality conditions of Montana are subject to both the Montana and Federal ambient air quality regulations. In many cases the Montana and Federal regulations are similar--with the allowable air pollutant concentrations being the same. Ambient air quality standards are in effect for particulate matter (PM-10), gaseous pollutants (sulfur dioxide, carbon monoxide, nitrogen dioxide, photochemical oxidants, lead [gaseous or particulate], and hydrogen sulfide), and visibility. Of primary concern to snowmobiling are the ambient standards for carbon monoxide, nitrogen dioxide, and visibility. The carbon monoxide ambient standard is for one hour and eight hour pollutant concentrations. The nitrogen dioxide standards are for hourly and annual concentrations. The Montana visibility standard is of concern to snowmobiling, as the activities generally occur in remote areas where visual impacts are of concern.

TOPOGRAPHY

The snowmobile trail systems and areas accessed by the systems are predominantly in mountainous terrain. The mountainous country can be divided into high and low categories. High country areas are characterized by elevations from 7,600 feet to over 10,000 feet above mean sea level (m.s.l.), vertical and extremely steep slopes (over 60%), and snow depths between five and fourteen feet. The western one-third of Montana is typified by two types of mountain ranges. The mountains in northwestern Montana extend in narrow bands oriented in a north south configuration. The southwestern mountains are also oriented primarily in a north-south direction, with higher elevation ranges separated by broad, smooth-floored valleys or basins. In addition to the trail systems that utilize existing roads, trails and bottom areas associated with stream drainages, the high country avails both open wet meadow areas and dry meadow areas on ridgetops and mountain passes, for snowmobile use.

Low country areas are characterized by elevations from 4,500 to 7,500 feet m.s.l., average slopes of 30 to 40 percent, and snow depths between two and six feet. Trails access dry meadow areas, ridgetops and mountain passes for snowmobile use.

The remainder of Montana consists of rolling prairies dissected by major waterways and ephemeral streams. Islands of smaller mountain ranges are found dispersed throughout the eastern two-thirds of Montana. No funded trails systems currently exist in eastern Montana.

SOILS

The mountainous terrain, in which a large percentage of snowmobiling is conducted, exhibits many different types of soils. Mountain slopes and ridges, basins, wet meadows, rolling uplands, glacial trough walls, flood plains, terraces, alluvial fans and landslide areas are examples of the diverse surface characteristics in mountainous terrain. For example, close to 100 soil mapping units describe the soils in the Helena National Forest (USFS 1992). Soil mapping units are the standard within the National Cooperative Soil Survey, through which the soils are classified, and the suitability and potential for major land uses are determined. The survey ultimately provides engineering characteristics, management limitations (in appropriate productive use categories), and overall limitations and hazards.

Back-country roads and trails used by snowmobiles are dominated by soil mapping units characterized by gravelly and cobbly loams, silt loams and silty clay loams--with five to six percent organic material--highly variable depths, rock outcrops, and slopes in the 20 to 40 percent range. Wet meadows exhibit deeper loams (potential to 60 inches over bedrock) and flat slopes. Some areas have surface layers formed in volcanic-ash-influenced loess deposits. The soils characterizing the roads, trails, and areas used by snowmobiles have a high erosion hazard and do not have a high potential for successful revegetation (USFS 1992). Where cut banks exist on roads and trails, sloughing and erosion potentials are high. Sediment delivery efficiency is high in the areas where soils that are rock outcrop complexes exist, and slopes are in excess of 50%.

HYDROLOGY

The aspects of hydrology that are important to snowmobile trail systems and other areas accessed by snowmobiles include 1) stream channels and bottom areas associated with the channels, 2) watersheds that provide runoff to the stream channels and 3) runoff (water, snow & ice) that discharges from the watersheds to the stream channels. The runoff itself is not usually discussed as a component of the affected hydrologic environment. However, in the case of snowmobiling, the snow plays an important part in the affected environment.

Both perennial and ephemeral stream systems characterize the mountainous terrain used by snowmobiles. The stream channels exhibit wide ranges of slope and location configurations. Where slope gradients of 40 to 60 percent exist, and drainages are closely spaced, a high level of sediment delivery efficiency exists (USFS 1992). This means that increased volumes of sediment delivered into a channel with high sediment delivery efficiency would result in the sediment being transported to downstream receiving waters with little loss. Stream channels differ in their material composition, and in particular, where the soils of flood plains and terraces are crossed, sediment delivery efficiency is high.

In the mountainous terrain used by snowmobiles, the watersheds or drainage areas that contribute runoff to stream channels, vary in size, slope, and vegetation. The manner in which they deliver snowmelt and rainfall runoff to receiving streams also varies. Watersheds with high average slope gradients, little to no vegetation, and thin rocky soils, have little ability to hold moisture, thus quickly delivering runoff to ephemeral stream channels. Watersheds characterized by low-average slope gradients (combined high slope and basins), high percentage of vegetative cover and deep soils, have the ability to regulate the delivery of runoff to stream channels, therefore creating perennial or seasonal flows in receiving streams.

In mountainous terrain where temperatures of zero degrees centigrade or less occur, precipitation occurs as snow. The accumulations and melt from this is of great economic and social significance. Snow presents potential recreational benefits, water resource management opportunities, and breathtaking scenery--as well as hazards of great importance.

Snow hydrology, as a scientific sub-discipline of hydrology, provides standardized methods for evaluating snow for water management and the prevention of flood catastrophe related to snowmelt and runoff release. For the purposes of assessing snowmobiling impacts, the natural processes of snow metamorphosis, snowpack and compaction characteristics and radiation reflectivity are the most important aspects of snow surveying and snow classifications.

Natural snow metamorphosis includes melting and recrystallization to the point where the snowpack is said to be ripe. Snow is ripe when the internal structure of ice crystals in air spaces is quite uniform, and conditions of temperature, texture and moisture are such that further melting or additions of melt water will generate runoff (Dunne 1978, Chow 1974). Compaction characteristics of the snow determine how quickly snow ripens. All other factors remaining the same, external compaction can slow the ripening process. The reflectivity, or albedo, of a snowpack influences the melting rate. A low reflectivity, resulting from debris or dark colored soil on the snow, enhances the absorption of radiation heat causing a high rate of melting (Chow 1974, Linsley, 1968).

WILDLIFE

Montana's wide variety of topographic and climatic conditions, complex soil structures and vegetation types, produce a vibrant diversity of wildlife habitat supporting over 500 species of mammals, birds, and reptiles (MDA, 1991). The moist western one third of Montana's climate hosts coniferous forests, montane grasslands, and riparian forests. The various elevations and exposures of those habitats are used seasonally by wildlife for cover and forage, courtship and birthing areas, migration corridors and loafing. The dry eastern two thirds of Montana is dominated by shrublands, mesic grasslands dissected by breaks, badlands, coulees, wooded draws, open conifer forests and riparian shrub and forest communities, which provide important seasonal habitat wildlife values (MBOGS 1989).

Montanan's interests in wildlife and outdoor recreation are more than nominal, a fact underscored by the number of hunting, fishing, boat and snowmobile licenses and parks access permits purchased each year. Figure 3-1 identifies state wildlife management areas that were established to maintain and enhance habitat and provide for diverse recreational opportunities. The majority of the current wildlife management areas contain ungulate winter range and as such, are usually not open to snowmobiles or other human use from the end of the general hunting season to May 15th of each year.

Species of notable interest across Montana include elk (*Cervus canadensis*), moose (*Alces alces*), mule deer (*Odocoileus hemionus*), white-tailed deer (*Odocoileus virginianus*), antelope (*Antilocapra americana*), mountain goat (*Oreamnos americanus*), bighorn sheep (*Ovis canadensis*), mountain lion (*Felis concolor*), bobcat (*Lynx rufus*), lynx (*lynx canadensis*), wolverine (*Gulo luscus*), black bear (*Ursus americanus*), grizzly bear (*Ursus horribilus*) and in a few areas, the gray wolf (*Lupus lupus*).

In western Montana, wintering areas for elk, .mule and white-tailed deer are predominately found in intermontane valleys and foothills of the various mountain ranges of the Rocky Mountains (Figures 3-2 and 3-3). As snow depths increase in the mountains, mule deer and elk usually migrate to lower elevations (typically 5,000 feet or lower) where forage materials are more easily available due to shallower snow conditions (Carroll et al, 1992). In some areas migrations of several dozen miles may occur. Wintering areas frequently exist in narrow horizontal-elevation bands, bounded by high snowfall areas above, and urban and agricultural activities in the valley bottoms below (MDA, 1991). Existing wintering areas are annually increasing in importance to wildlife as alternative land-uses compete for utilization of the more temperate, seasonal habitats.

Eastern Montana has less well-defined large-area seasonal wildlife use areas due to the less-rugged topography and generally lower elevations (Carroll et al, 1992). Deer, for instance, may move from north to south-facing slopes on the same hill or ridge in winter. In eastern Montana winters, thermal cover from wind chill provided by both topography and vegetation is very important for many species, deer and antelope in particular.

Montana supports a spectrum of raptors such as hawks, owls, falcons, and eagles, which are found in all areas of the state at least seasonally and often year-round, as are dozens of other bird species. Many Waterfowl nest in Montana and typically migrate south to warmer climates in the winter. Some waterfowl stage in Montana on their migrations to far northern climes in spring, and again in fall as they wing south.

Currently, nine wildlife species found in Montana are classified under the Federal Endangered Species Act of 1973 as either endangered or threatened. Endangered species are those determined to be in danger of extinction throughout all or a significant portion of their range, whereas threatened species are likely to become endangered in the foreseeable future. Endangered species in Montana are the peregrine falcon (*Falco peregrinus*), whooping crane (*Grus americana*), gray wolf, black-footed ferret (*Mustela nigripes*), bald eagle (*Haliaeetus leucocephalus*), least tern (*Sterna albifrons*), and pallid sturgeon (*Scaphirhynchus albus*). The grizzly bear and piping plover (*Charadrius melodus*) are classified as threatened. Habitat change, and in some instances the loss of individual animals, could lead to extinction of certain threatened and endangered species (MDA, 1991).

Under Montana's Non-game and Endangered Species Act (87-5-101, M.C.A.), four species are classified as endangered, including the peregrine falcon, whooping crane, gray wolf, and the black-footed ferret.

Distribution and general habitat requirements of the major game animals in Montana are factors to be considered when establishing and/or using snowmobile trails. Elk, moose, mule and white-tailed deer are the species most likely to be encountered by snowmobilers. This is largely due to their wider distribution and greater population numbers. It is commonly noted that these ungulates (moose and elk specifically) often use groomed trails as convenient travel corridors between feeding areas. Bighorn sheep, mountain goats, grizzly and black bear are less likely to be encountered.

Elk are well distributed throughout the mountainous western one-third of Montana and in some isolated areas in eastern Montana. Because elk can be in conflict with agricultural interests, most larger populations are found in conjunction with large blocks of public land (Rognrud and Janson 1971). Elk habitats in Montana are frequently classified as either browse or grass ranges, depending upon the plant species available as winter food. In general, browse habitats are those west of the continental divide in the more heavily timbered areas, while grass ranges are in more open areas east of the divide. Browse plants commonly used are willow (*Salix spp.)*, maple (*Acer spp.*), serviceberry (*Amelanchier spp.)*, chokecherry (*Prunus virginiana*) and buck brush (*Ceanothus.spp*). Grasses commonly used are Idaho fescue (*Festuca idahoensis*), rough fescue (*Festuca scabrella*) and bluebunch wheatgrass (*Agropyron spicatum*).

The ubiquitous mule deer is found throughout Montana, and consequently inhabits quite varied habitats. In general, mule deer prefer an open type country, i.e. "open forest, brush, and shrublands found in conjunction with steep, broken, or otherwise rough terrain" (Boyd et al. 1986). Most mule deer found in mountainous western Montana move seasonally between winter and summer range, a characteristic less apparent in those living in prairie habitats (Mackie and Dusek 1992). Deer densities are often much higher on winter ranges in the mountainous areas than on the less restricted summer ranges. Although food habits will vary somewhat from prairie to mountain habitats, browse plants (shrubs) available above the snow surface will provide a large part of the winter diets in both cases.

White-tailed deer are widely distributed in Montana, with at least a few being found in every county in the state. However, white-tails are often more restricted in preferred habitat availability than mule deer, especially east of the continental divide. There are some notable exceptions (Bear Paw, Judith, Snowy Mountains and Long Pines), but white-tails are found primarily in association with deciduous vegetation along drainages. West of the divide, white-tails are usually associated with closed canopy Douglas fir/ponderosa pine forests (Allen 1971). Browse plants are important food items in both areas, although forbs become important in the summer, particularly for deer east of the divide. Alfalfa and grain are used when available.

Moose are located in Montana primarily in the northwest and southwest counties (Stevens 1971). Moose regularly emigrate from areas of high population density and consequently often show up in areas not commonly considered moose habitat. Often living in association with willow and aquatic habitats, moose show considerable adaptability in habitat acceptance. They may be found in spruce/fir community types and deciduous forests where browse plants common to each of the areas may be utilized for food. Moose populations in the winter tend to be more concentrated as limited habitat provides fewer areas for dispersal upon exposure to human activity.

Bighorn sheep, though once abundant throughout Montana, were reduced to a few remnant populations by the early 1940's. A program of transplanting has increased the numbers, and healthy populations are widely distributed throughout previously historic habitat in western Montana. Bighorns are very susceptible to lungworm and associated health problems. Mountain goats choice of preferred winter habitat makes chances of direct human contact less likely.

Black bears are distributed from western Montana to the foothills east of the continental divide. They are present in some of the isolated mountain ranges east of the divide (Weckwerth 1971A). Although they may inhabit spruce/fir habitats throughout the year, they will move seasonally into other habitats to follow food abundance, at times even encroaching on populated areas. Black bears den up from approximately late October to early May.

Grizzly bears are most frequently found in remote forested areas of Montana including Glacier and Yellowstone National Parks, Flathead and Kootenai National Forests, the Mission, Absarokee and Cabinet Mountains, and the Bob Marshall Wilderness Area (Weckwerth 1971B). Grizzlies will occupy a variety of mountain habitats from open rock slides and mountain meadows to heavy timber.

VEGETATION

The major characteristics of vegetation which must be considered in assessing potential environmental impacts are its distribution, production, diversity, and response to stress. The historical and existing environment of Montana controls each of these characteristics in a variety of important ways. This environmental control and interactions with it may be described as the ecology of Montana. Vegetation is a product of the interaction of parent material, organisms, relief, climate, and time (Odum 1960), which collectively may be considered as the environment. Any change in one of these factors necessarily results in vegetational change.

Distribution of vegetation in Montana is primarily a consequence of soils and climate (Ross and Hunter, 1976). The mosaic of parent materials and soils throughout Montana strongly influences the gross distribution of plant life forms and species. Climate may be less dramatic in its effects, but it nevertheless determines not only the gross distribution of plant species, but also the kind and numbers of genetic variants. Vegetation patterns can also be affected by other factors, including historical use by herbivores, fire, local topography, human disturbance, and introduction of alien plant and animal species. Due to complex factor interactions, straight-forward cause and effect relationships are seldom found in nature. Plants reflect the conditions which prevail in the environment they occupy, and their presence or absence is a useful diagnostic tool in ecological assessments.

Vegetative production expresses the growing conditions provided by a particular environment. The average amount of plant biomass produced on an annual basis by a plant community, plant population, or individual plant, integrates and expresses the moisture, light, heat, and soil conditions which exist at a site. The diversity of vegetation usually reflects the complexity of the environment and the kinds and number of niches which have been successfully occupied by plants and animals. These relationships are often of an interdependent nature.

Elevation, slope, and aspect play a major role in vegetational composition and distribution, as does parent material and local and regional climate. Resultant plant communities can be identified by dominant life forms, such as trees, shrubs, or perennial grasses. A number of classification schemes group similar vegetation into habitat types or other characteristic units (Bailey, 1982; Pfister, 1977). Such vegetation maps for Montana have been published (Ross and Hunter, 1976).

Representative vegetation of the mountains and foothills impacted by snowmobiles includes coniferous forest and shrub species, such as spruce, firs, pines, junipers, and sagebrushes. Many additional species of grasses, forbs, shrubs, and grasslike plants comprise the bulk of the vegetation complex. In the grasslands of Montana, perennial grasses, forbs, shrubs, and trees comprise the complex plant communities which have evolved under the constant influence of drought and fire. Each distinctive environment in Montana has its own complement of plant and animal species, making its response to any disturbance or impact relatively unique.

The vegetation of Montana is strongly affected by the network of rivers, streams, and lakes which covers the State. In central and eastern Montana, the Missouri, Yellowstone, Milk, Musselshell, and Big Horn Rivers and their tributaries drain to the east and south, eventually reaching the Mississippi River. In western Montana, the Clark Fork, Bitterroot, and Kootenai Rivers and their tributaries drain westward to the Columbia River. These rivers and streams

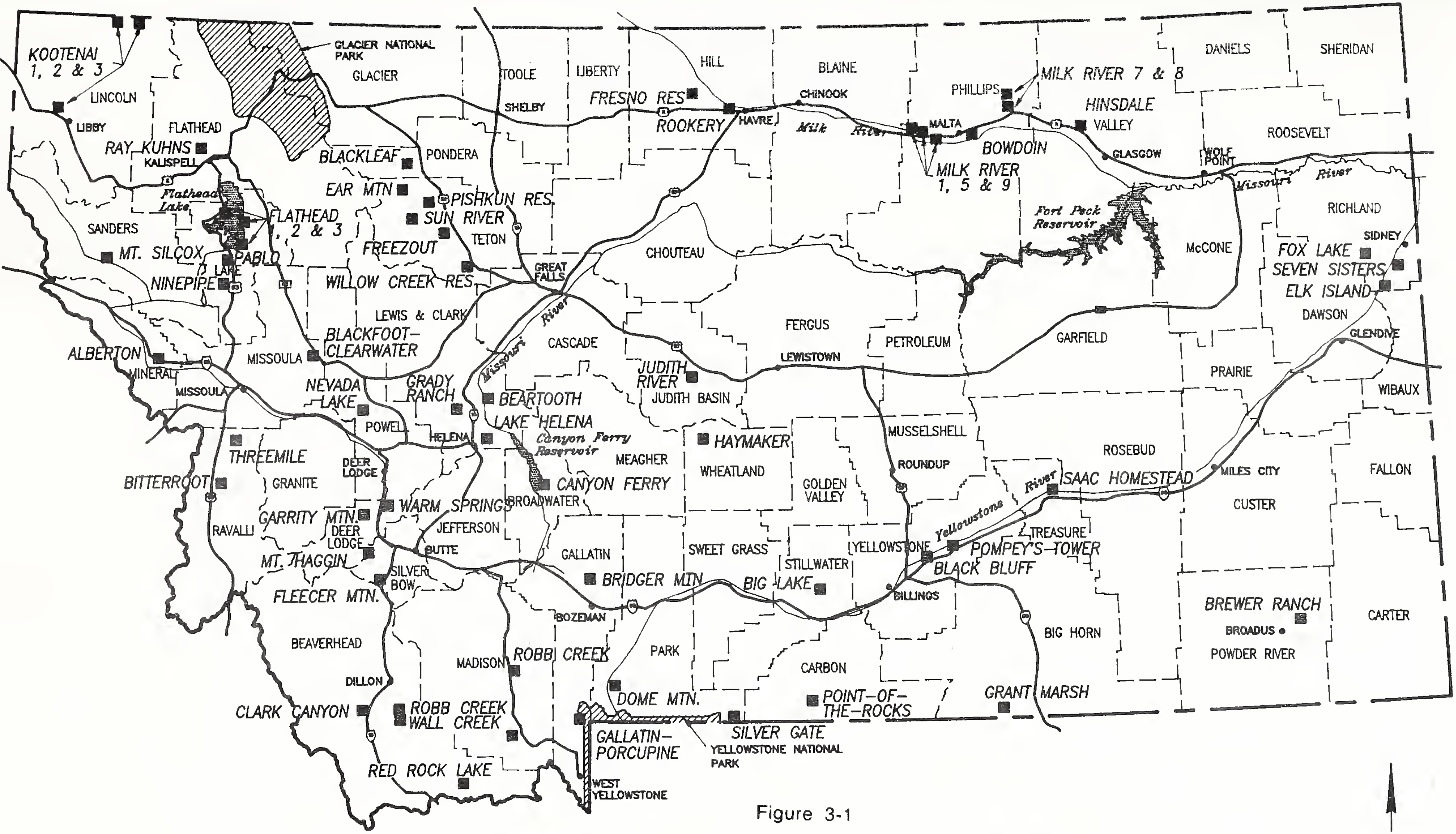


Figure 3-1

STATE WILDLIFE MANAGEMENT AREAS

SCALE: 1" = APPROX. 80 MILES

EXPLANATION

■ – STATE WILDLIFE MANAGEMENT AREA

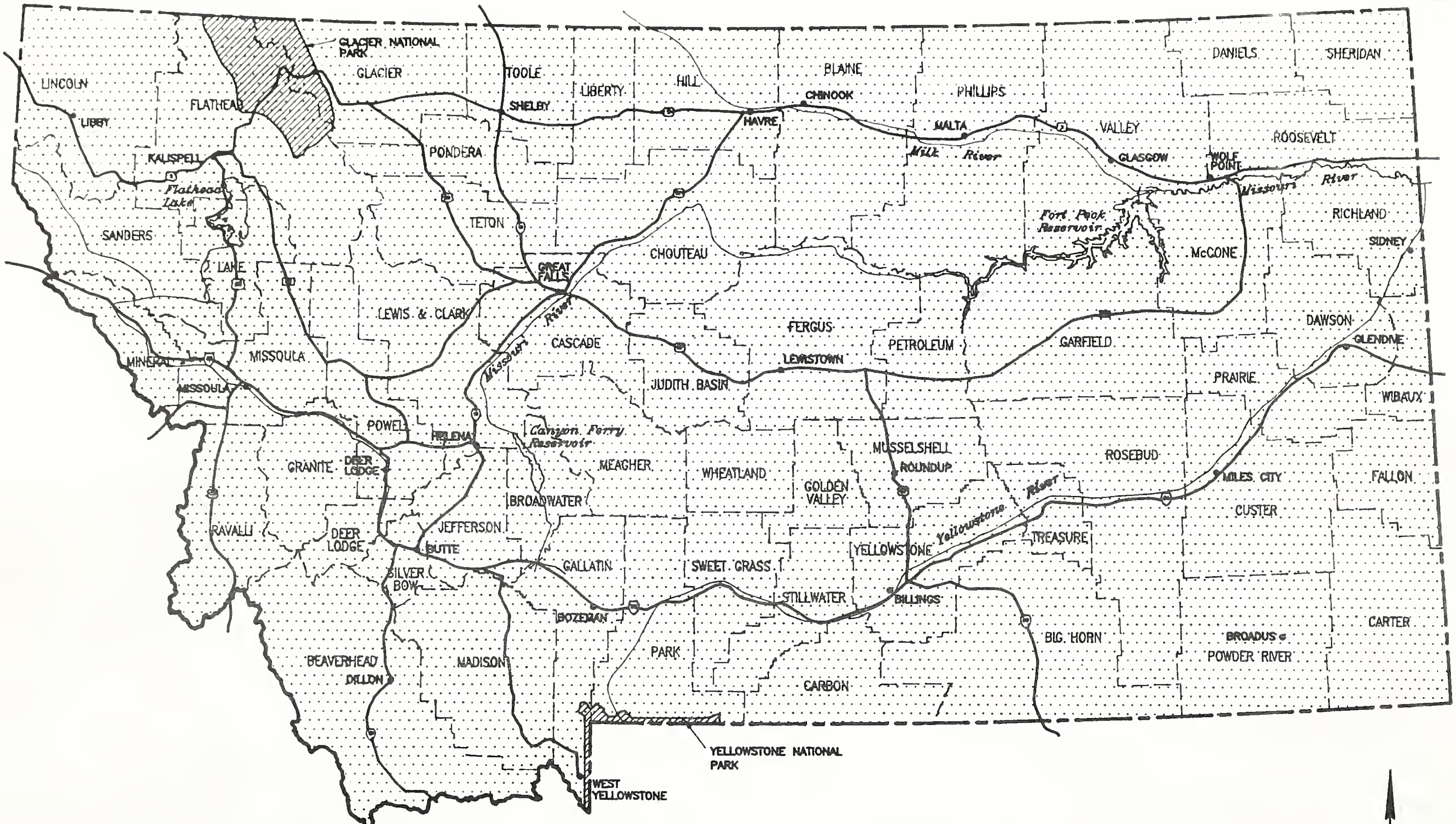


Figure 3-2

MONTANA MULE DEER DISTRIBUTION

SCALE: 1" = APPROX. 80 MILES

EXPLANATION

⁘ – MULE DEER DISTRIBUTION

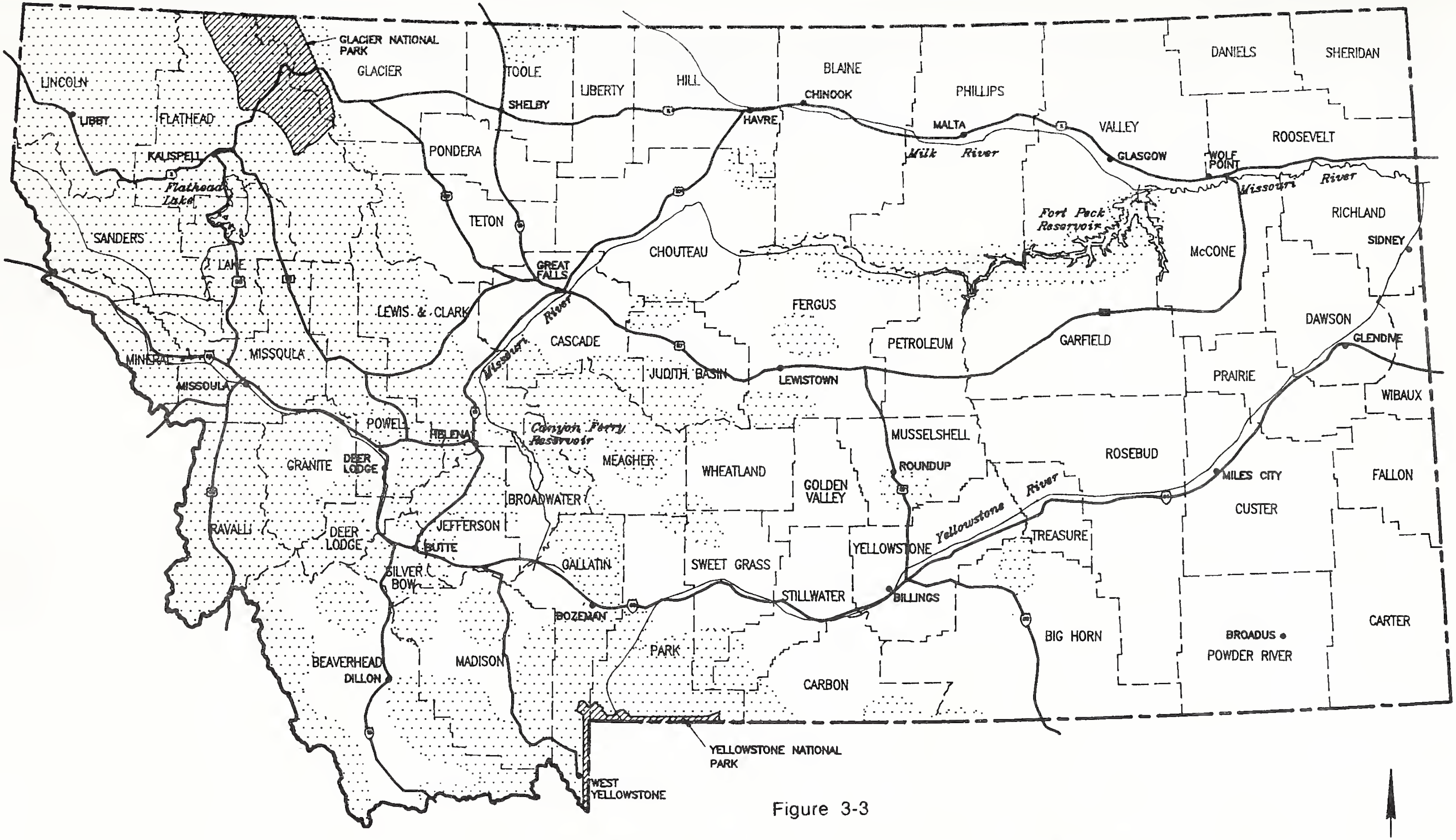


Figure 3-3

MONTANA ELK DISTRIBUTION

SCALE: 1" = APPROX. 80 MILES

provide definitive riparian habitats for plants and animals alike. They are typically highly productive and diverse, with water tables at or near the surface in areas adjacent to surface water. While relatively small in area, the riparian environments of Montana are especially important in their ecological and social roles.

Mountainous regions of Montana contain unique zones of alpine and subalpine vegetation and habitat. These special environments, because of their elevation and insolation characteristics, as well as their geology, are particularly stressful for all organisms. Only the hardiest or specially adapted species persist in alpine and subalpine zones. These limiting growing conditions are largely responsible for the fragility of alpine ecosystems and their sensitivity to disturbance. Montana contains a portion of one of the largest of such environments in the world, the Beartooth Plateau.

SOCIOECONOMIC

Economic Conditions

Since 1970 the economy of Montana has fluctuated from steady growth in the 1970s, through a recession in the early 1980s, followed by minor declines and recoveries through 1991. The economy has never returned to the growth years of the 1970s; however, recently, the economy has been strengthened by new construction associated with highway rebuilding and housing construction afforded by lower interest rates and some in-migration.

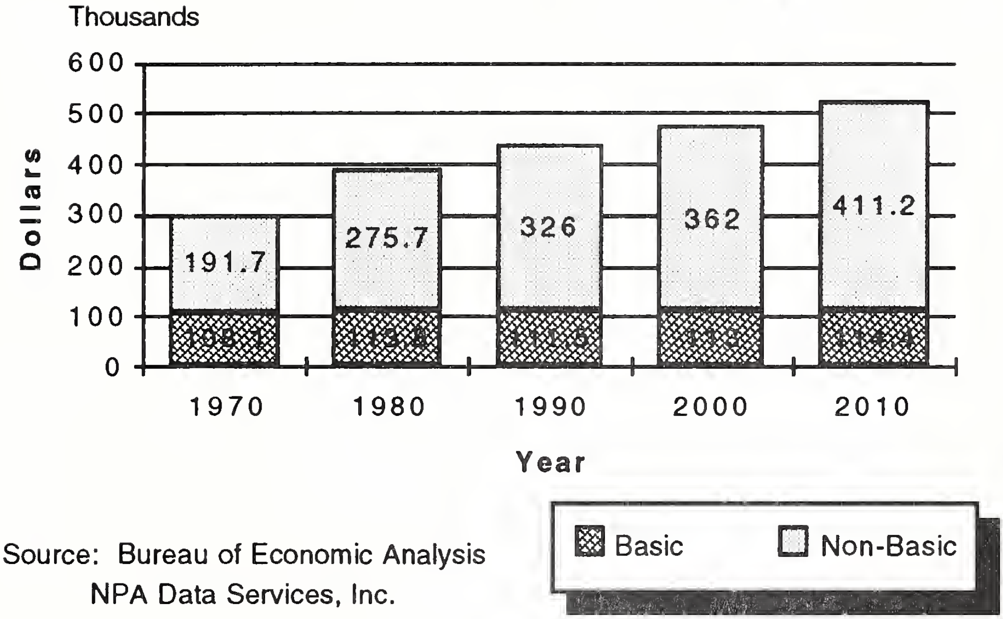
Total employment increased at an annual rate of 2 percent from 1970 through 1990 with most new jobs occurring in nonbasic industries (Figure 3-3). Specifically, of the net increase of 131,500 jobs created in Montana since 1970, 62,000 were in the services sector and 28,000 were in the retail trade sector (Figure 3-4). Tourism is an important part of these two industrial sectors and annually contributes about 13 percent of the total services and retail sector jobs in Montana (University of Montana, Institute for Tourism and Recreation Research, 1988).

Baseline population and economic projections for Montana were developed by National Planning Association Data Services Inc. (NPA) of Washington, D.C.

Employment in Montana is projected to increase by 88,000 jobs by 2010, which is a somewhat smaller growth rate than experienced between 1970 and 1990. All of the growth is expected to come from nonbasic industries. Retail trade and services sector growth are projected to about equal their 1970-90 growth rates.

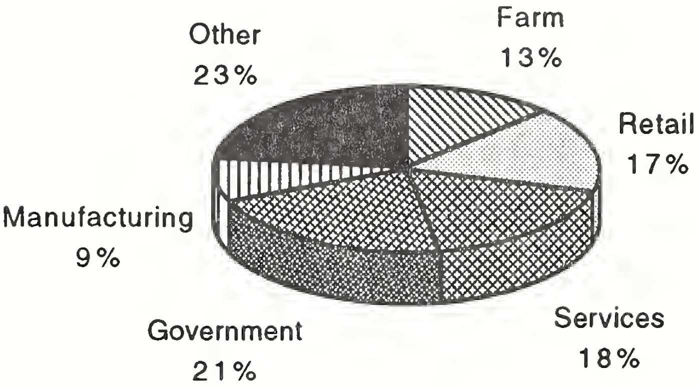
Since 1970, household personal income in Montana has declined when compared to the United States (Figure 3-5). In 1990 household income in Montana was $29,149 (1987 dollars), or approximately 79 percent of the United States average of $37,080. This difference is projected to continue worsening through 2010, when state per capita income is expected to equal $34,962, or 76 percent of the projected United States average of $45,452.

Figure 3-4
Montana Employment 1970-2010

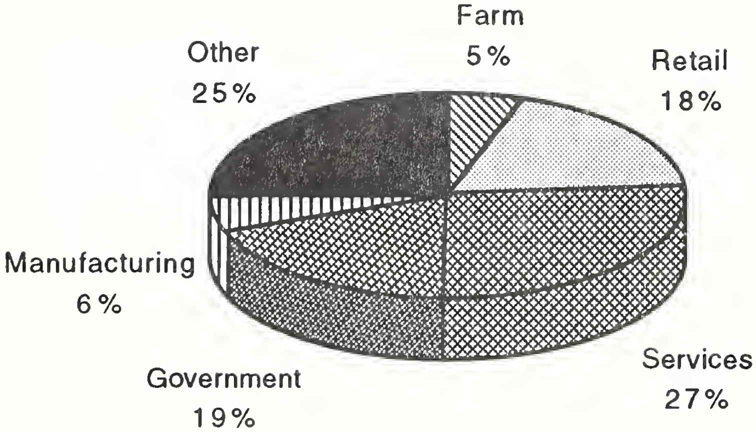


Source: Bureau of Economic Analysis
NPA Data Services, Inc.

Figure 3-5
Montana Employment Composition
1970



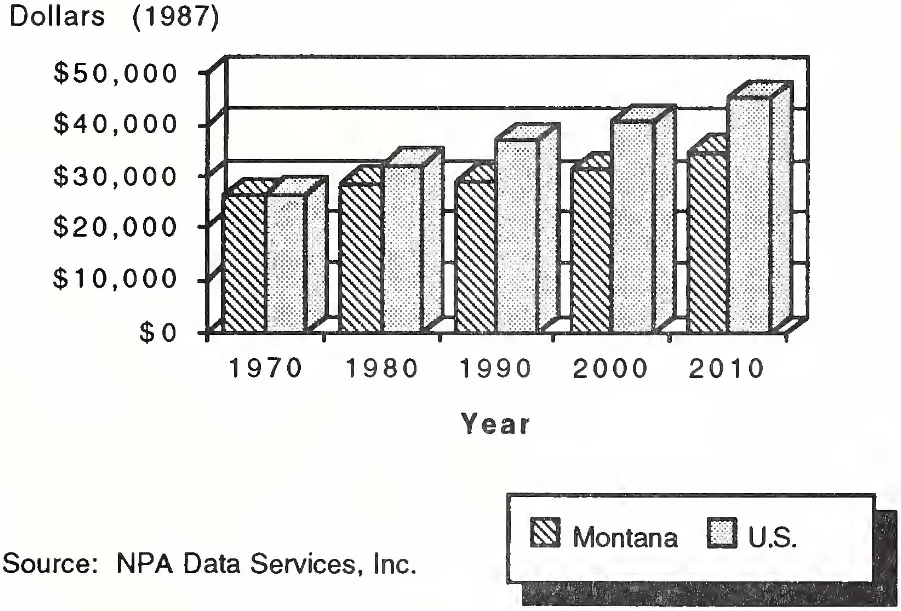
1990



Source: Bureau of Economic Analysis

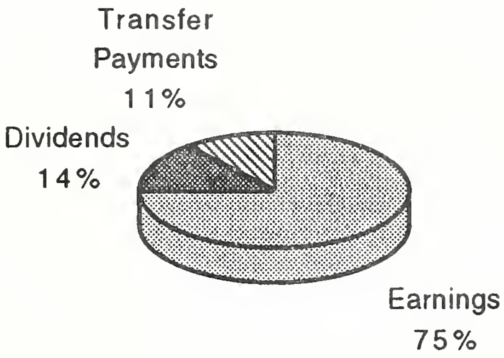
Sources of total personal income in Montana have changed markedly over the past 20 years. In 1970, earnings generated 3 of every 4 dollars of income, while dividends and transfer payments, primarily government payments to individuals in the form of retirement, disability, and medical payments, comprised about 25 per cent of total income (Figure 3-6). By 1990 the importance of earnings, as a portion of total income, had declined to 60 percent, while dividends and government payments each contributed approximately 20 percent. Even though employment increased by 46 percent over the 20-year period, earnings did not enjoy the same growth, since most of the employment increase was in non-basic industries, which typically pay less than basic jobs.

Figure 3-6
Montana and U.S. Household Income
1970-2010

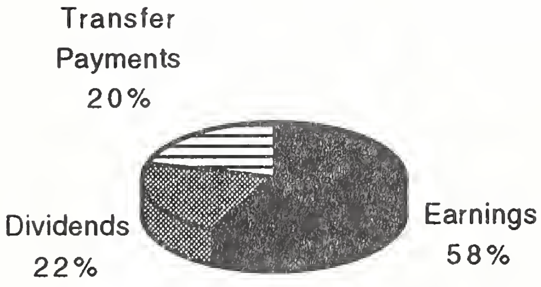


Source: NPA Data Services, Inc.

Figure 3-7
Montana Personal Income Sources
1970



1990



Source: Bureau of Economic Analysis

Fiscal conditions of state and local governments in Montana have fared about the same as the general economy. While general state tax revenues increased substantially between 1980 and 1990, the demand for additional services pushed expenditures from $1.0 billion to $2.0 billion. At the present time, the state is facing a serious shortage of general fund revenues and will need to trim expenditures or expand the tax base to keep the fund in balance. Over the 1980-90 period, general fund revenues for local governments increased from $492 million to $900 million, or about 83 percent. This increase was about the same as inflation.

Traditionally, Montana has spent a majority of their state and local revenues on education. Nearly 1 in every 3 tax dollars collected in the state is spent on education. Social services and transportation received the next largest share of the tax dollar, requiring about one-fourth of all tax revenue. In 1990, Montana's per capita expenditures for state and local government functions was $3,655, which was somewhat higher than Idaho and South Dakota, but was less than North Dakota, Wyoming, and the U. S. average (University of Montana, Montana Business Quarterly, Autumn 1992).

The travel and tourism industry contributes to both the economic and fiscal health of state and local governments in Montana. In the summertime, tourists flock to the two national parks, blue ribbon trout streams, and other natural amenities that cannot be found in other states. In the wintertime, the principal attractions are the dozen or so ski slopes and an abundance of snowmobile trails and systems available in Western Montana. In 1990 highway travel to Montana increased by approximately 4 percent while visits to Montana's national parks reached all-time highs. Yellowstone Park recorded nearly 3 million visits in 1990 while Glacier Park had more than 2 million visitors (University of Montana, Montana Business Quarterly, Spring 1990). Nonresident spending in Montana reached $760 million in 1990, an increase of 16 percent over 1989 levels.

The average daily expenditure for highway travelers in Montana was about $80 per day during the wintertime, with a majority of this amount being spent on retail sales, lodging, and food. About $12 of the total daily expenditure was spent on gasoline. The average group size of the winter travelers in Montana was 2.8 persons and the average time spent in the state was 2.9 nights. Of the $760 million spent by nonresident travellers in 1989, about $85 million or 17 percent was spent during the winter months. The estimated wintertime payroll to accommodate the winter travellers was $52 million, creating approximately 3,200 jobs (University of Montana, Institute for Tourism and Recreation Research, 1990).

Snowmobiling is an integral part of winter recreation in Montana. In 1988, The Bureau of Business and Economic Research, University of Montana, conducted a survey among resident and nonresident snowmobilers to determine the impacts of snowmobiling on the economy. According to the study, an estimated 20,000 nonresident snowmobilers travelled to Montana during 1988, with an average stay of 5.4 days. Nonresident snowmobilers spent about $15.3 million in Montana during the 1987-88 season. The spending of out-of-state snowmobilers generated labor income of about $3.8 million which created approximately 350 jobs. Nearly 95 percent of all nonresident expenditures and jobs created by these expenditures occurred in Region 3, which includes West Yellowstone, Cooke City, Bozeman, and Butte. Over 80 percent of the activity from nonresident snowmobilers occurred in West Yellowstone.

The Snowmobile Program benefits state and local economies directly and indirectly. Direct benefits include local expenditures by the program to assist in grooming trails, maintaining facilities, and for local purchases. Indirect benefits are realized from the promotion of snowmobiling through groomed trails, law enforcement, signing programs, and other activities that promote positive snowmobiling. All of these activities increase snowmobile usage and consequently expenditures and tax revenues. DFWP estimates that 25 direct employment opportunities are made available to local areas through the trail grooming program.

Funding for the Snowmobile Program comes from a one-half of one percent tax on all gasoline sold in Montana for highway purposes. The number of gallons of gas sold in Montana decreased from 475 million gallons in 1980 to 440 million gallons in 1985 and has remained at about that level through 1991. The decrease in gasoline sold was primarily due to automobile economy. Future levels of gasoline sold in Montana are expected to stay at about the 450 million gallon level through the year 2000. Revenues to the snowmobile account have increased over the years because of tax increases imposed by the Montana legislature. In 1980 the state tax on gasoline was $.09 per gallon. This was increased to $.15 per gallon in 1984 and $.20 per gallon in 1988. Both of these tax increases also increased revenue to the Snowmobile Program by corresponding proportions.

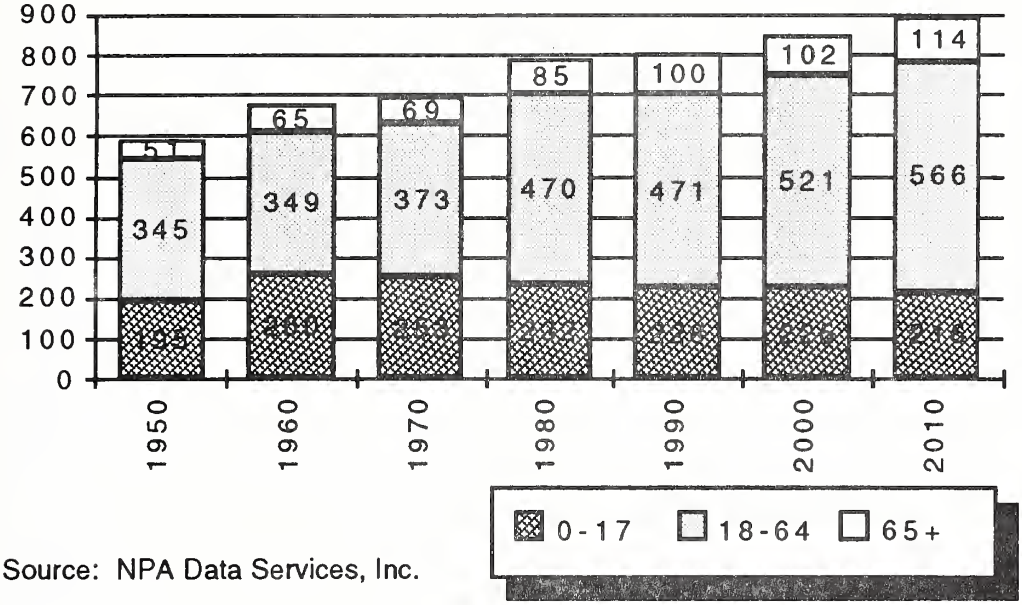
Demographic Conditions

Between 1950 and 1990, the population of Montana grew sporadically, expanding with economic growth in the 1950s and 1970s and stabilizing with economic downturns in the 1960s and 1980s (Figure 3-7). The overall growth rate from 1970 to 1990 was 15.1 percent, with over 95 percent of this growth occurring in the 1970s. Following the national recession in 1982 and subsequent declines in energy exploration and wood products manufacturing, Montana experienced a net out-migration of its population in every year from 1984 through 1990.

From 1990 to 2010, the population of Montana is expected to grow at about the same rate as it did from 1950 through 1990. By 2010, NPA projects the population of Montana to total 913,730, approximately 14 percent more than the 1990 census. The makeup of the population should be significantly different, however, with a smaller percentage of young people and a higher proportion of people in the retirement age bracket.

Resident snowmobiler demographics differ from the general population in several respects. Resident snowmobilers tend to be slightly older, have fewer college degrees, and earn slightly more income than the average Montanan (University of Montana, Bureau of Business and Economic Research, 1988). Nonresident snowmobilers tend to have more education and earn more income than their Montana counterparts. The largest number of nonresident snowmobilers came from the nearby states of Utah, Idaho, and Wyoming. Nonresident snowmobilers who came from more distant areas were mostly from Michigan, California, and Minnesota.

Figure 3-8
Montana Population 1950-2010



Source: NPA Data Services, Inc.

Social Conditions

Leading indicators of social well-being of Montanans present an overall improvement since 1970 (Table 3-1). On the positive side, the number of Montanans receiving at least a high school education increased by 33 percent between 1970 and 1990. The unemployment rate fell from 8.3 percent in 1980 to 7.0 percent by 1990. The divorce rate for Montana, declined between 1980 and 1990, after increasing substantially between 1970 and 1980. In addition, the crime rate, which had increased dramatically between 1970 and 1980, fell by 11 percent between 1980 and 1990. The percent of housing lacking complete plumbing facilities declined in each decade, from 3.5 percent in 1970 to 0.8 percent in 1990.

Other indicators of social well-being are less positive. The percent of families below poverty level remained about equal between 1970 and 1980, but increased by one-third by 1990. The median family income, in terms of 1990 dollars, has declined from $30,046 in 1980 to $28,044 in 1990 - a level that is less than the 1970 median family income. Net migration also turned negative in the 1980-90 decade after a small net in- migration from 1970 to 1980. Most of the people out-migrating from the state were young high school and college graduates seeking employment opportunities that could not be found in the state.

Table 3-1

Indicators of Social Well-being in Montana 1970, 1980, and 1990

Indicator	1970	1980	1990
Education (percent completing 12 or more years of school:	61.2%	75.4%	81.0%
Percent of families below poverty level:	10.4%	9.1%	12.0%
Percent of housing lacking complete plumbing facilities:	3.5%	1.8%	0.8%
Median family income (1990 dollars):	$28,454	$30,046	$28,044
Per capita personal income as a percent of national average:	95.0%	87.8%	82.0%
Unemployment rate:	6.0%	8.3%	7.0%
Crime rate (major crimes per 1,000 population):	2.89	4.68	4.17
Divorce rate (marital separations per 1,000 population):	4.4	6.3	5.1
Estimated net migration during previous 10 years:	-58,000	+20,000	-65,000

Source:
(1) U.S. Bureau of Census, 1970, 1980, and 1990.
(2) Montana Board of Crime Control, Annual Report, 1980 and 1990.
(3) Montana Department of Health & Environmental Sciences, Vital Statistics - Annual Report, 1970, 1980, and 1990.

The social well-being of Montanans includes subjective information as well as reportable statistics. How people interact with each other and their environment, including recreation, is an important part of the social well-being of all communities. Sociologists, physicians, and philosophers alike suggest linkages between lifestyles lacking in healthful recreational activities and such manifestations as greater risk of heart attack, lessened self-confidence, and lower productivity on the job (Opinion Research Corporation, 1977).

Most Montana residents place a high value on the natural environment and the amenities that it provides in terms of outdoor recreation. In past years, many Montanan's outdoor recreation ended with the first snowfall. Winter was a barrier, characterized by lessened mobility, reduced social interaction, and a marked decrease in out-of-doors activities (International Snowmobile Industry Association, 1988). Today, snowmobiling has extended the outdoor recreation season and is one of the most popular outdoor winter activities in Montana. Over 15,000 Montanans own snowmobiles, and in some areas of Montana snowmobiling is as important as automobile travel. Many snowmobiles are used across Montana for research, business and government purposes, search and rescue, and for providing shuttle service to areas inaccessible by automobile.

CULTURAL RESOURCES

Nearly all of the affected environment which is the subject of this programmatic EIS, occurs in the mountainous regions of Montana. There are a number of existing documents which detail the nature of prehistoric, historic, and traditional cultural resource sites in such environments. The United States Forest Service has prepared cultural resource overviews for a number of the National Forests in Montana. These reports are an excellent source of information on cultural resources which occur on Forest Service property. They include Overview: Ecological and Cultural Prehistory of the Helena and Deerlodge National Forests, Montana (Knight 1989), The Prehistory of the Lolo and Bitterroot National Forests: an Overview (McLeod and Melton 1986), Cultural Resource Overview, Bitterroot National Forest (Caywood and Light 1984), Historical Overview of the Helena and Deerlodge National Forests (Beck 1989), and The Prehistory of the Custer National Forest: An Overview (Beckes and Keyser 1983). The United States Department of the Interior, Bureau of Land Management has also prepared cultural overviews of all three of its Montana districts which include some mountainous environments. Those reports are: Prehistoric Cultural Resource Overview of Southeast Montana (Deaver and Deaver 1988), An Overview of the Archaeology and Prehistory of the Lewistown BLM District, Montana (Ruebelmann 1983), An Archaeological Overview of Butte District Prehistory (Deaver and Deaver 1986).

Cultural resources include prehistoric, historic, and traditional or sacred sites. Prehistoric sites are defined as those which are known to have been used or occupied before written records were kept of an area. In Montana, the boundary between history and prehistory is generally accepted as 1805 when the Lewis and Clark Expedition passed through the state. Although whites probably visited the state even earlier, good documentation of those visits is lacking. Protohistoric sites are those which are known to have been occupied after North America and the New World were visited by Europeans (ca. A.D. 1492) but which were occupied by native peoples largely unaffected by European settlement. Sites older than 50 years can qualify as historic sites and in special circumstances sites younger than 50 years can qualify. Prehistoric sites in Montana include those which date earlier than A.D. 1805. There is some overlap between the protohistoric and prehistoric periods but generally sites over approximately 200 years old are considered prehistoric. Traditional or sacred Native American sites are localities known, through historic records and oral traditions, to have been used or are currently being used for purposes of worship (prayer, fasting, vision-questing, etc.), commemoration (battle sites, places where important persons lived and/or died, and so on). Special purpose Native American traditional sites can include plant collecting localities, pipestone collecting localities and other similar areas.

There are a variety of prehistoric archaeological sites which occur throughout Montana, including the mountainous regions of the state. They range in age from several hundred years old to about 11,500 years old. These sites include lithic scatters, the most common of all archaeological sites, which are generally restricted to either on or near the ground surface. Lithic scatters contain flakes and artifacts made of the stone with which prehistoric peoples were making tools and weapons. Lithic scatters are common in forested areas.

Stone circle or tipi ring sites, although much more common on the plains of eastern Montana are known to occur in mountainous areas, particularly in valleys and on flat benches and other landforms. These localities are campsites where prehistoric, protohistoric and historic Native Americans erected tipis and placed stones around the tipi base to hold the lodge cover in place. They are generally quite visible on the surface, but a few buried tipi ring sites are known.

Buried or stratified campsites also occur in forested regions of Montana. These campsites are usually not visible on the ground surface but have been buried by natural deposition of soil. Artifactual materials can be found eroding from stream banks, in rodent mounds, in road ruts, and in other erosional exposures. Sometimes there is no indication whatsoever on the ground surface that a prehistoric campsite lies buried below. Buried campsites may include features such as campfires and roasting pits.

Pit house village sites are a unique manifestation where Indians of the northwestern and Great Basin areas of the United States built semi-permanent dwellings. Although no such sites have yet been found in Montana they are quite common in Idaho and could occur in the mountains of extreme western Montana. Known pit house localities include both buried and surface sites.

Wickiups and timbered lodges are sites which functioned as dwellings for aboriginal people. Wickiups are conical structures fashioned from dead trees and limbs. The trunks and limbs are generally laid around the trunk of a living tree which functioned as a center pole. Wickiups have been identified in a variety of locations in western Montana--including the area of Yellowstone Park and the Jefferson River, along with its upper tributaries area. Timbered lodges are often free-standing structures formed from a variety of deadfall. They take various forms but are generally circular. They are most common in forested portions of eastern and southcentral Montana.

Rockshelters or caves are common in mountainous areas of Montana. These natural features were sometimes used for habitation and occasionally for special functions such as burials and depicting art. The features themselves are often quite visible. Artifacts in them may or may not be visible on the surface.

The raw material from which prehistoric peoples fashioned stone tools was one of the most important natural resources for those people. In western Montana, a majority of large-scale, long term, stone quarries occur where mountain-building processes have exposed a variety of bedrock formations. These sites are particularly abundant in areas of volcanic and limestone formations. They are often highly visible on the surface and present features such as extraction pits. Lithic artifacts generally cover the ground in such localities. Prehistoric stone procurement sites are not restricted to bedrock sources but include secondary sources such as glacial and river gravels.

Rock art sites include pictographs (paintings on rock faces or outcrops) and petroglyphs (motifs or figures etched or carved into rock faces or outcrops). Petroglyphs seem to be more common in eastern Montana where soft rock formations such as sandstone are more prominent--

lending themselves more to etching. Pictographs are more numerous in western Montana where more resistant rock formations lend themselves to painting. These sites can be associated with other site types such as rock shelters and campsites as well as specialized sites such as burials. Many contemporary Native Americans consider all rock art sites to be of sacred significance.

Scarred trees are a site type which seem to be nearly unique to western Montana, although a few instances are known from eastern Montana. These scars are thought to relate to harvest of the sugar rich inner bark, or cambium, of some tree species which was used as a diet supplement by aboriginal peoples. The predominance of scarred tree sites occur in old growth Ponderosa pine, but such features have also been observed on cottonwood, lodgepole pine and western larch. These scars are generally quite evident, although they could easily be confused with timber blazing, ax scarring, or natural stripping by animal species. Some prehistoric and historic cambium peeling sites have associated campsites with artifactual content. Those artifacts may or may not be evident on the surface.

A number of historic Native American and white trails are known from western Montana. Historic trails can often be documented in early historic literature of an area. Some historic Native American trails are thought to have a pattern of use that pushes back into prehistory. Although many historic trails have fallen into disuse, evidence of them sometimes remains. Trails can be identified by cleared paths, sometimes with obvious depressions and cut trees. Historically, some peoples marked trails with blazed trees and stone piles. In other instances, a trail may be known from historic documents, but physical evidence may be lacking.

Rockpiles, cairns, medicine wheels, effigies, vision quest structures and other alignments are sites constructed of stones. These sites are thought to have served a variety of purposes. Cairns and rockpiles sometimes mark trails. Some larger cairns have been the location of prehistoric and historic burials. Alignments of smaller rockpiles are known to be associated with communal game kills such as bison jumps. The function of many cairn and rockpile sites remains unknown. Medicine wheels take a variety of forms. They generally include a large central cairn, with varying numbers of stone or rockpile lines radiating from them. Medicine wheels are believed to have been of ceremonial and religious significance to prehistoric and historic aboriginals. Effigies are motifs which are formed by stones or piles of stones. They occur in a variety of forms including anthropomorphic and animalistic figures. These sites are often of sacred significance to contemporary Native Americans and are believed to be ceremonial or commemorative in nature. Vision quest sites are usually identified by the presence of U-shaped or piled rock structures which open to the east. There are prehistoric, historic, and contemporary vision quest sites, all having extreme, religious significance to Native Americans. All of these rock-constructed site types are generally evident on the surface, although their configuration is not always obvious. Two very obvious sites of this type are found in mountainous regions of the west. The Big Horn Medicine Wheel occurs on top of a mountain in the Big Horn mountains of northern Wyoming. The Madison effigy is an anthropomorphic "Napi" figure on the west side of the Madison River near Three Forks, Montana. Many drive lines and linear stone alignments exist in the large, intermountain river valleys of western Montana.

Aboriginal burials are a special site type with extreme importance to Native Americans. Although they are not common in Montana, they are known to exist. They include subsurface interments, cairn or rockpile interments, talus slope interments, and surface burials. Historically Plains Indians often disposed of bodies on the surface in constructed scaffolds, trees, and ceremonial shelters or tipis. Little or no evidence remains of surface burials. Interment burials are often unnoticed until a cairn is disturbed, or until subsurface excavation exposes human remains and burial goods.

Historic, non-aboriginal sites come in a wide variety of forms. Probably the best known historic site type of Montana are its ghost towns. Other site types include foundations, foundation pits, houses and other structures associated with farming, ranching, mining, and fur trading. Military posts and camps are another prominent site type. Trash dumps or refuse piles also qualify as historic sites. Trails, roads, railroads, work camps, bridges, dams, irrigation ditches, mine tunnels and pits, and other features can also qualify as important historic sites. Some Forest Service structures themselves appear on the National Register of Historic Places. Historic sites and structures occur within existing cities and towns. Historic sites can appear as multiple feature sites such as ghost towns, or they can appear as solitary features such as a trash dump or root cellar depression. Historic sites are common throughout Montana. The western Montana area, where development followed fur trading and mining, has abundant historic remains.

Some archaeological site types described above are valued sacred or traditional localities for contemporary Native Americans. Other religious sites may not have archaeological evidence indicating their sacred status, yet through contemporary oral traditions and historic records, are known to be significant. Devil's Tower and Bear Butte of the Black Hills region are examples where archaeological evidence is lacking, but where importance to contemporary Native Americans is unquestionable. The Sweetgrass Hills of northcentral Montana are another example of a natural landmark which is of extreme sacred significance to Native Americans. Arrow Rock, near Pryor, Montana, the Medicine Tree, near Sula, Medicine Tree Hill near Missoula, and Chief Mountain, on the east boundary of Glacier Park, are other examples of natural localities which remain as important, contemporary Native American places of worship. The point to be made concerning sacred or traditional sites is that their need not be evidence on the ground indicating their status. Collecting grounds for rare ceremonial or medicinal plants are also localities which could qualify as Native American sacred or traditional sites. The catlinite or pipestone quarries of Minnesota are an example of special purpose sites of extreme importance to historic and contemporary Native Americans. Here Native Americans continue to obtain special stone used in the manufacture of ceremonial pipes. Significant traditional sites are not defined exclusively as places of worship.

AESTHETICS

Visuals

Montana's visual resources are based on the scenic quality of landscapes and the public's perception of them. Therefore, it is very difficult to characterize visual resources in a manner agreeable to all parties. Visual resources are managed in Montana through efforts by federal, state and local agencies as well as by private land owners.

The Forest Service and BLM have similar visual management systems in that they initiate the visual management process by inventorying the scenic quality of the lands they manage. The variety of visual elements (form, line, color and texture) is evaluated to determine landscapes of distinctive, common, or minimal visual quality. Sensitivity levels--a measure of people's concern for the visual resource-- is evaluated next. In determining the vulnerability of areas to scenic degradation, both systems consider travel routes, areas of use, water bodies, and public concern for scenic values. Both systems incorporate distance of views from viewers--foreground/middleground, background, and "seldom seen"--into the analysis. Each system combines the above criteria to arrive at measurable objectives for managing the visual resource (MBOGC, 1989).

Visual resources on private lands are not managed under any structured program, although concern for scenic values does exist. These concerns are often brought to public attention when proposed developments or activities are perceived as likely to disrupt or change the visual character of an area. Local groups are often formed to represent popular concerns and work with government entities or private enterprises to resolve conflicts in mutually beneficial ways.

Areas of particular sensitivity include residential areas, recreation sites, or any setting where the existing character or visual quality is valued. Because of its low population densities and variety of landscapes, Montana has a number of such areas. Rural residences, small unincorporated communities, resort communities and semi-developed areas adjoining large cities are among these potentially sensitive areas. Campgrounds, recreation sites, undeveloped rivers and streams are also potentially sensitive. This sensitivity is determined by the perceptions and values of residents and visitors in regard to the visual intrusion from proposed development or activity (MBOGC, 1989).

Noise

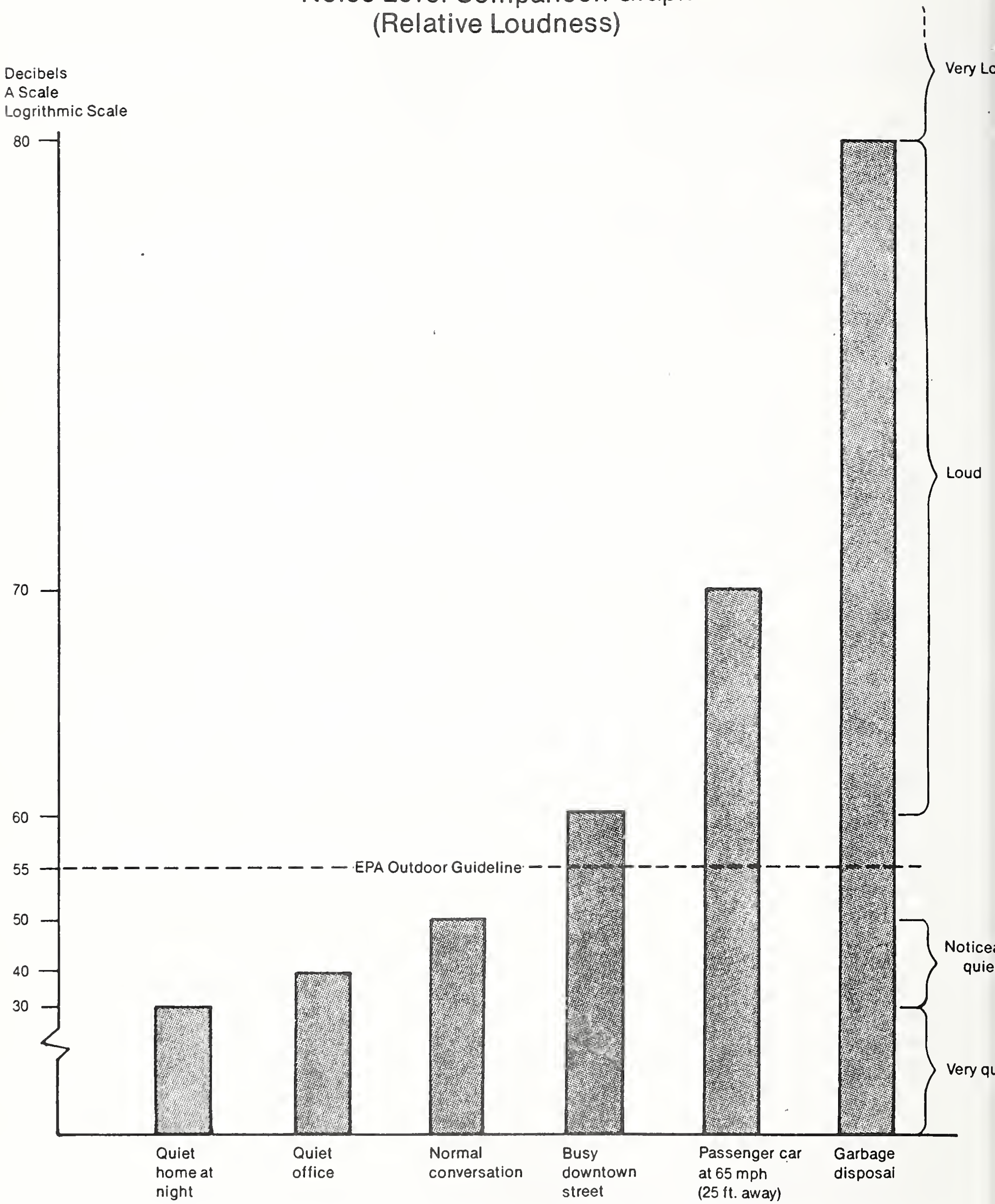
Sound levels in rural Montana settings are generally low, with most sounds from natural sources (wind, water, animals). Where human activity is dispersed, such as in forests, and agricultural areas, sound levels depend on the location of the source and any local screening or sound muffling conditions. Sound levels in higher density residential areas, resorts or towns is generally derived from vehicles, diesel motors, commercial and industrial operations (MBOGC, 1989).

When addressing the affect of noise levels on humans and animals, the A-weighted decibel scale is commonly used. This scale approximates the auditory perceptions of the human ear at moderate sound levels (Harrison et al. 1980). Figure 3-8 shows the relative loudness of different noise levels.

The Environmental Protection Agency (1974) uses 55 dBA during the day and 45 dBA at night as the levels below which there are no documented adverse effects to human health or welfare (National Academy of Sciences, 1977). The 55 dBA guideline applies to long-term continuous noise exposure. In comparison, a sound level of 35 dBA is approximately the background noise level in rural areas and is the level where sleep interference begins (Toole 1979; Golden et al. 1979). Persons in rural areas expect lower background noise levels than those in urban and developed areas (Stolen 1980; Toole 1979). The magnitude of this rural "peace and quiet" factor varies by location, but the expected background rural sound levels are generally 5 to 20 dBA quieter than those in urban areas (Harrison et al. 1980). Areas in rural Montana have low (30-35 dBA) background sound levels characterized by wind, water, animals, and other natural sounds (Krueger 1987; Stolen 1980). (MBOGC 1989).

Figure 3-8

Noise Level Comparison Graph
(Relative Loudness)



SOURCE: Engineering Dynamics, 1984, and Dames and Moore, 1986

Logging, ranching, farming, mining, or vehicle travel causes elevated sound levels in the immediate vicinity of the activity, but these locations are generally widely dispersed and away from human residences. "Evenings with still, humid air provide near optimal conditions for sound to carry, while turbulent, dry air conditions dampen sound transmittance (MBOGC 1989).

The Department's regulations on snowmobile noise require that every snowmobile be equipped at all times with noise-suppression devices, including an exhaust muffler in good working order and in constant operation (23-2-634, M.C.A.). The Department has accepted the EPA noise rating for snowmobiles and established noise regulations based on a maximum output of 78 dBA measured at fifty feet. All persons owning or operating a snowmobile manufactured after June 30, 1975 must maintain the machine in such a manner that it will not exceed the sound level limitation of 78 dBA at fifty feet.

RECREATION

Outdoor recreational opportunities in Montana occur on both publicly and privately held land, and can be grouped into four categories--travel and nature-based activities, water-based activities, winter activities, and organized games and sports (Frost and McCool 1986). These categories can be further divided into two general classifications--motorized and non-motorized activities.

Recreation settings and opportunities on privately held lands in Montana are diverse. Opportunities range from developed sites such as private campgrounds, ski areas, and recreational vehicle parks, to large dude ranches and resorts that offer trail rides, fishing, hiking, and hunting. Many other activities take place on both privately owned land and adjacent public lands. Outfitters also may use both private and public land for dispersed activities such as hunting and back-country pack trips. All activity on privately held land requires landowner consent.

Recreation in Montana on public lands covers a wide spectrum of activities. Developed recreation sites for camping, picnicking, relaxation, skiing, and water-based activities are located in national parks, on national forests, BLM and state-owned land. State parks, fishing access sites, and wildlife management areas are all part of the state park system managed by the Department. Numerous county and city parks and recreation sites provide opportunities for both outdoor and indoor recreation. A significant portion of recreation in Montana is the dispersed use of state and federal lands. Popular activities include cross-country and alpine skiing, hunting, fishing, backpacking, camping, and snowmobiling (MBOGC 1989).

Winter recreation opportunities in Montana include activities on public and private lands. Non-motorized winter recreation activities include cross-country skiing, downhill or alpine skiing, snowshoeing, dog sledding, ice sailing, and ice climbing. Motorized recreation opportunities include snowmobiling, snow-touring and sight-seeing.

Snowmobiling is an integral part of winter recreation in Montana. An average of 20,000 out-of-state snowmobilers visit Montana each year and another 15,000 snowmobiles are registered by

Montana residents. Twenty-eight snowmobile trail systems in Montana receive funding through the Snowmobile Grant Program. 3200 miles of groomed trails make up the systems which are found from south-central Montana to the far northwest corner of the state. Snowmobiling also occurs on private and public land across the state in areas where no established trail systems are located. Many public lands are open to snowmobiling, with permits needed only for organized events. Snowmobiling is not permitted in areas designated as roadless or wilderness, and are also prohibited in some special game management areas.

The 1988 State Comprehensive Outdoor Recreation Plan (SCORP) provides information on various types of recreational use levels in Montana. For reported snow-oriented activities, snowmobiling accounted for 474,000 activity days while cross-country skiing accounted for 754,600 activity days. Information from the Institute of Tourism and Recreation, University of Montana, 1990 participation rates, indicate that 15.9% of study respondents participated in snowmobiling while 17.8% participated in cross-country skiing.

Cross-country and downhill or alpine skiing occur predominately in the mountainous terrain of western Montana. The wind swept plains provide little opportunity for skiing in the east. Snowshoeing, dog-sledding, ice sailing and ice climbing take place across Montana in locations where climatic conditions, topography, and land use allow.

LAND USE

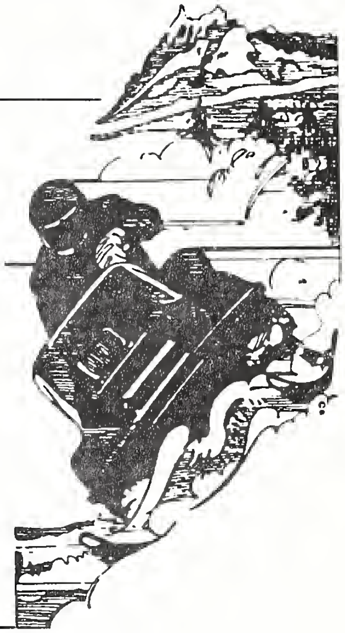
Montana's land-use structure is predominantly agricultural in nature, with about two-thirds of that being rangeland and pasture that support the livestock industry. Cropland constitutes the remaining one-third of agricultural land in the state. Land ownership in Montana is comprised primarily of 1) federal lands (29.5%), 2) Indian-owned lands (2.4%), 3) state-owned lands (5.9%), and 4) privately owned or rights-of-way (62.2%)(MDA 1991).

The western portion of the state is characterized by federally administered National Forest lands at higher elevations and private land in the valleys. Northern Montana is largely privately owned rangeland, except for extensive areas of BLM lands and three Indian reservations in the east. Southeastern Montana is a mix of private and BLM lands, with four additional federal parcels comprised of National Forest. Central and south-central Montana consist mostly of private land surrounded by large parcels of National Forest lands. The central region consists largely of BLM lands along its northern edge, Indian reservations along the south edge, and regions of private land holdings dispersed throughout.

Snowmobile trails funded by the Grant Program are located primarily in the western one-third of Montana. A majority of the trails are located on National Forest lands with intermittent crossings of state owned land and private right-of-ways. The forest lands in the western region constitute 31% of the total land base in the state and are basic to the economy (MDA 1991).

Comprehensive land use plans have been established in thirty-two of Montana's 56 counties. In addition, nine counties have cities with comprehensive plans that "include provisions for influencing land use in an area extending up to about 4 1/2 miles from the city limits through the creation of planning or zoning districts" (MBOGC 1989). Plans for the development of new trails (not on existing roads) or related facilities either within a zoning district or in areas under the development restrictions set forth in the comprehensive plans, would have to meet the requirements established therein. These requirements could include the development of a technical plan of operations to be reviewed by the county or city planner, and in some cases the planning commission.

Notes:



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ENVIRONMENTAL CONSEQUENCES

This chapter contains the Department's analysis of probable impacts to the human environment that would result from the management of the Montana Snowmobile Grant Program. It also contains the analysis of probable cumulative impacts; impacts that would result from other existing and reasonably foreseeable activities associated with the program or region-specific trail systems.

The following assumptions were made in the impact analysis contained in this chapter.

- The sport of snowmobiling would continue in Montana regardless of the Grant Programs existence.
- Long term snowmobile activity and trail usage will increase as populations expand.
- The Snowmobile Grant Program provides support for the sport of snowmobiling in Montana, therefore, impacts of the program discussed in this document will include the impacts of snowmobiling on the environment, rather than the literal analysis of impacts caused solely by the administration of the program.
- Direct impacts are those associated with the various disciplines that occur on or directly adjacent to the existing or proposed trail systems.
- Indirect impacts are those associated with the various disciplines that occur off of the existing or proposed trail systems. Since the funded trail system provides a means by which snowmobilers can access non-funded "play areas" (areas away from the funded trail systems) impacts associated with these activities are considered to be indirect.
- The scope of this PEIS does not cover organized events such as snowmobile drag races that do not utilize trails funded under the Snowmobile Grant Program.

- Impacts discussed under Alternative 2 are based on the assumption that no structured trail program would exist, and that the establishment of any trails would be from volunteer activities under limited guidance from land management agencies.

- Qualitative terms are used to describe the anticipated magnitude of impacts and, where appropriate, anticipated importance of impact to the human environment. The terms "major," "moderate," "minor," and "negligible" describe magnitude. While the magnitude of impacts is identified under each resource in this PEIS, it is important to remember that the terms address the impacts on a programmatic or statewide basis. Locally, the magnitude of impacts could differ significantly from the general impact conclusions drawn in this PEIS. Site-specific determinations will be made by the appropriate land management agency in fulfilling NEPA and/or NEPA compliance procedures.

- "Significant," "potential to become significant," and "insignificant" describe importance. Impacts are assumed to be insignificant unless otherwise identified.

- Cumulative impacts are defined as collective impacts of the program when considered in conjunction with other past, present, and reasonably foreseeable activities. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time.

- The impacts discussed in this chapter are general in nature and do not correspond to specific trail systems or communities.

ADMINISTRATIVE

SUMMARY

Impacts associated with the overall administration of the Snowmobile Grant Program involve potential future liabilities and associated fiscal burdens. Such impacts would result should the Department be held liable for environmental damage incurred from projects funded under the program.

Lack of coordination with other agencies could lead to increased state lease and jurisdictional enforcement dispute as well as inadequate environmental considerations or avalanche safety consultation.

A policy of enhanced environmental review procedures combined with a restructured review committee and modifications to the application requirements, would reduce potential legal and economic impacts to the Department. This would ensure coordinated management of the statewide network of snowmobile trails and associated facilities.

Alternative 1

Impacts to the Department's legal and fiscal administrative process. (issue 1)

Administrative impacts associated with the existing program are economic and legal in nature. Both of these impacts are related to the potential for environmental degradation resulting from the Department's existing Grant Program.

As currently administered, potential future liabilities exist based on claims of environmental degradation resulting from perceived limitations in Department environmental policy. These potential liabilities, associated with projects funded by the Department, are not quantifiable. However, should the Department or the State of Montana be held liable for environmental damage incurred as a result of projects funded under the Grant Program, substantial economic impacts could occur. Although the state is self-insured and the Department has a liability insurance policy that names the Department as the primary insured and the grant recipients as additional insured, indirect fiscal burdens could be incurred by the Department and the Grant Program. Such a determination could reflect on the amount of funds available for future grants.

The Department has determined that impacts to the legal and fiscal administrative process associated with Alternative 1 would be minor to moderate in the short and long terms.

Impacts to coordination efforts between the Department and other agencies. (issue 1)

Increased snowmobile activity and a subsequent rise in grant applications could break down the coordination efforts between the Department and other land management agencies. The monumental task of coordinating the Department's review of grant applications with environmental reviews, along with permitting processes of other agencies, could result in impacts ranging from state lease and jurisdictional enforcement disputes, to approval of grants without adequate environmental considerations or avalanche safety consultation.

The Department concludes that impacts to administrative coordination under Alternative 1 would be minor in the short term and moderate in the long term.

Alternative 2

Impacts to the Department's legal and fiscal administrative process.

As it is impossible to determine if and where the Legislature would reassign the program upon its discontinuance with the Department, only those impacts associated with the administration of the Department will be addressed.

Legal and economic impacts associated with potential future liabilities would be eliminated under the discontinue program alternative. Some managerial changes in the administration of the Department's trails program would occur. Most changes would occur in the loss of positions most associated with the snowmobile trails program. Direct funding in the amount of $95,000, utilized by the Department for overhead and administrative costs, would be lost.

The Department has determined that impacts to the legal and fiscal administrative process associated with Alternative 2 would be minor to moderate in the short and long terms.

Impacts to coordination efforts between the Department and other agencies.

Impacts presented under Alternative 1 would be more severe, therefore resulting in more legal and fiscal burdens for those agencies left to manage snowmobile activities on their respective lands.

The Department concludes that administrative coordination impacts under Alternative 2 would be moderate over the short and long terms.

Alternative 3

Impacts to the Department's legal and fiscal administrative process.

As in Alternative 1, the administrative impacts associated with Alternative 3 are primarily economic and legal in nature. Because of the increased review and management responsibilities established under Alternative 3, costs associated with the administration of the Grant Program would increase. These cost increases would reflect the need for an additional full or part-time staff person, agency liaisons, or contractor services, to 1) review applications for MEPA/NEPA compliance, 2) provide technical assistance and inter-agency coordination, and 3) improve project evaluation. Increased administrative costs would be funded by the monies allocated to the Grant Program. Current administrative costs withdrawn from the State Special Revenue Fund, total 22% (10.6% overhead, 11.5% parks administration) of the program funding. Assuming that under Alternative 3, administrative costs withdrawn would total 26%, the funding available for direct grants would be reduced by $17,000 under current funding. This reduction in grant monies available to clubs and other applicants would result in a decline in the number of grants awarded and/or a decrease in the amount of each award.

Potential liability for the Department and the State of Montana associated with Alternative 3 would be reduced through expanded environmental assessment capabilities and procedures established under this alternative. The Department would have the ability to provide more effective oversight and scrutiny of individual grant applications to ensure against potential environmental degradation. Gaps in data would be identified more readily and complete field evaluations could be performed if necessary. Documentation capabilities, program reviews and applicant performance appraisals would be improved under Alternative 3.

The Department has determined that impacts to the legal and fiscal administrative processes associated with Alternative 3 would be minor in the short and long terms.

Impacts to coordination efforts between the Department and other agencies.

The establishment of a multi-agency review committee would ensure against overlap in administrative duties, and provide for environmental, legal, fiscal, enforcement and safety consultation before approving applications.

Alternative 3 would require greater short-term administrative responsibilities on the part of all agencies, but would result in long-term benefits in the form of greater program efficiency, less legal and fiscal burdens, and improved safety and enforcement records.

The Department concludes that impacts to administrative coordination associated with Alternative 3 would be negligible to minor over the short and long terms.

AIR QUALITY

SUMMARY

Air quality impacts are associated primarily with areas exhibiting high concentrations of snowmobile activity. Impacts are compounded by temperature inversions which keep emissions from snowmobiles, home heating units and automobiles from dispersing. Age, model, efficiency, temperature and fuel types of snowmobiles cumulatively influence the level of air quality impacts found in recreation based winter communities.

Air quality impacts along trails are less than in areas of intensified snowmobile activity. The network of trails making up most funded systems in Montana, allows for dispersion of emissions from individual machines, thereby reducing the cumulative affects found in recreation based winter communities.

Impacts under Alternative 3 would be less than Alternatives 1 and 2 as a result of 1) improved public awareness, 2) expanded system configurations, and 3) support for industry reforms.

Alternative 1

Impacts to air quality in and around recreation based winter communities. (issue 2)

Temperature inversions and high concentrations of snowmobile activity may combine to create poor air quality in and around recreation based winter communities. Several studies are available that demonstrate the air pollutant emission potential from snowmobiles. However, the studies were derived from emission tests conducted on snowmobiles prior to 1975. These studies provide some useful data on the air pollutant emissions. However, since fuel efficiencies have been improved and air pollutant emissions decreased since the snowmobiles of the early 1970's, these data can only be described as a worst case scenario. However, Table 4-1 does provide at least a relative comparison of the air pollutants emitted. From Table 4-1 it is evident that carbon monoxide is the air pollutant emitted in the largest quantities. Nitrogen dioxide and particulate emission rates are much less than carbon monoxide.

Concentrations of air pollutants can be cause for concern in areas of high snowmobile activity and poor climatic conditions. When numerous machines are started, idled, and driven from one area to another, significant air pollutant emissions can occur. Air quality problems often occur early and late in the day when air dispersion is minimal, causing a build-up of these air pollutants. Under these poor dispersion conditions, the air pollutants can remain trapped in a

Table 4-1

Emission Factors For Snowmobiles (U.S.EPA, 1985)
(Based on 362 cm3 displacement and 0.94 gal/hr fuel)

Pollutant	Grams/Gallon	Grams/Hour
Carbon monoxide	1040.	978.
Nitrogen Oxides	10.6	10.0
Sulfur Oxides *	0.90	0.85
Particulates	29.7	27.9

* Based on sulfur content of 0.043 percent by weight.

populated area for some time. Combining these emissions with exhaust emissions from motor vehicles, fuel oil or propane fired home or business heating, and wood stoves or fireplaces can create fairly high concentrations of carbon monoxide or hydrocarbons. Generally, these high concentrations of air pollutants occur relatively close to the resort area or the area that the snowmobiles are started. Once the snowmobiles are driven into the remote areas, air pollutant concentrations are reduced significantly due to the dispersion created by the moving machines and the separation between machines. However, the concern is that the highest concentration of air pollutants occurs where the most concentrated population occurs. Resort communities are appealing in that snowmachines can be started and driven directly from the motels, homes, or parking lots within the resort. However, because of this convenience, these conditions cause the public to be exposed to the highest concentrations of air pollutants.

With the increased fuel efficiencies and resulting reductions in air pollutant emissions from electronic fuel injection systems, the newer model snowmobiles help reduce the air quality problem on a machine by machine basis. However, as snowmobiling becomes ever more popular, the increased number of machines overshadows the reduction in emissions on the individual machines. Older snowmobiles or poorly maintained snowmobiles often produce much higher emissions of air pollutants than the newer and well maintained machines. One poorly maintained machine, as with a poorly tuned cars, can emit numerous times the air pollutants of a well maintained machine. By either eliminating the older machines or an incentive to keep machines well maintained, air pollutant emissions can be decreased.

Air pollutant concentrations could approach ambient air quality standards, especially for one hour carbon monoxide standards within concentrated use areas such as popular resorts. The Department concludes that air quality impacts in and around recreation based winter communities from snowmobile related activities would be moderate over the short term and negligible over the long term.

Impact to air quality along/around snowmobile trails.

Snowmobiles driven into remote areas are more efficient, due to warming of the engines, and do not emit the same level of emissions as when the machines are cold. However, air pollutant emissions still occur in relative amounts. Since the machines are dispersed and driven at higher speeds, concentrated air pollutants are not a problem. The smell of hydrocarbons can still be detected and can be a nuisance to others. The nuisance could become a concern especially if snowmobile trails are used by other recreationists.

Air pollutant concentrations should not approach or exceed air quality standards for gaseous pollutants or for visibility at any remote areas. The Department concludes that air quality impacts along and around snowmobile trails from snowmobile related activity would be minor over the short term and negligible over the long term.

Alternative 2

Impacts to air quality in and around recreation based winter communities.

Pollutant emissions would continue to degrade air quality levels in recreation based winter communities. People would still utilize snowmobiles in and around recreation based winter communities and elsewhere throughout Montana. Specific impacts identified in Alternative 1 would increase with the elimination of Departmental authority as identified in Chapter 2.

Air pollutant concentrations could approach ambient air quality standards, especially for one hour carbon monoxide standards within concentrated use areas such as popular resorts. The Department concludes that air quality impacts in and around recreation based winter communities would be moderate over the short term and minor over the long term.

Impact to air quality along/around snowmobile trails.

Air quality impacts from snowmobile emissions would continue along established trails, although to a lesser degree than within local communities. Concentrations of pollutants would not approach or exceed air quality standards for gaseous pollutants or for visibility at any remote area. The Department concludes that impacts to air quality along and around snowmobile trials would be minimal in the short term and negligible in the long term.

Alternative 3

Impacts to air quality in and around recreation based winter communities.

Air quality impacts would occur as discussed under Alternative 1. However, through implementing aggressive public awareness programs and providing support for improved industry emissions standards, as discussed in Chapter 2, air quality impacts would be reduced over time.

The Department has determined that air quality impacts in and around recreation based winter communities under Alternative 3 would be minor over the short term and negligible over the long term.

Impact to air quality along/around snowmobile trails.

Impact to air quality along and around snowmobile trails would occur as discussed under Alternative 1. The implementation of aggressive public awareness programs and providing support for improved industry emissions standards, as discussed in Chapter 2, would assist in reducing such impacts over time.

The Department has determined that air quality impacts in and around recreation based winter communities under Alternative 3 would be negligible over the short and long terms.

TOPOGRAPHY

SUMMARY

Topographic impacts would be limited to occasional cut-and-fill activities associated with trail and facility development and expansion projects. Cut-and-fill would be necessary in some instances to provide for a level surface on which groomers could operate safely.

Under Alternative 3, the Department would conduct an environmental review of the cut-and-fill activities to ensure compliance with policy, thereby reducing topographic impacts. Any activity determined to be impactive would be reevaluated and mitigating measures would be required before approval.

Alternative 1

Operation and Maintenance Projects. (issue 3)

Projects involving the operation and maintenance of existing trails, including signing and grooming activities, would have no long-term impacts to the topographic features of western Montana. These activities would occur on existing roadbeds or developed trails and would not require changes to the topography in the summer months. Short-term changes would occur to the natural features of snowcover on these trails as groomers and other snowmachines level the trailbed for safer snowmobiling.

The Department concludes that impacts to western Montana's topographic features from operation and maintenance of existing snowmobile trails under Alternative 1 to be negligible over the short and long terms.

Trail and facility development/Expansion Projects.

Construction of new, or the expansion of existing facilities such as trails, parking lots, bridges and shelters, could alter the existing topography and surface drainage system. Some construction or expansion projects require cut-and-fill activity to develop trailbeds which are sufficient for grooming activities to occur in the winter. If such activity were to occur on lands managed by a land management agency, the construction/expansion plan must meet design specifications set forth by that agency. In most cases, cut-and-fill benches used for trails, parking lots, or building pads, would be designed to complement existing topography and vegetation.

Cut-and-fill activities occurring on lands other than those managed by an agency, would have greater impacts to topographic features if design plans and specifications were not consistent with those established by land management agencies. Mass wasting (soil slumping, washouts, etc.), occurring as a result of improperly constructed facilities, could cause long-term topographic impacts. Precautions built in to the design plan would assist in avoiding such problems.

The Department concludes that impacts to western Montana's topographic features from trail and facility development/expansion under Alternative 1 to be minor over the short/long terms.

Alternative 2

Although program related trail grooming would not influence possible topographic changes, snowmobiling would continue on and adjacent to existing trails. Such activity would aid in compacting snow, possibly causing water to pool on the uphill side of compacted snow berms. Washouts could occur if the pooled water were to breach the berm and flow over bare or sparsely vegetated soils.

The Department concludes that impacts to western Montana's topographic features under Alternative 2 to be negligible over the short and long terms.

Alternative 3

Operation and Maintenance Projects.

Projects involving the operation and maintenance of existing trails, including signing and grooming activities, would have no long-term impacts to the topographic features of western Montana. These activities would occur on existing roadbeds or developed trails and would not require changes to the topography in the summer months. Short-term changes would occur to the natural features of snowcover on these trails as groomers and other snowmachines level the trailbed for safer snowmobiling.

The Department concludes that impacts to western Montana's topographic features from operation and maintenance of existing snowmobile trails under Alternative 3 to be negligible over the short and long terms.

Trail and facility development/Expansion Projects.

Construction of new, or the expansion of existing facilities such as trails, parking lots, bridges and shelters, could alter the existing topography and surface drainage system. Some construction or expansion projects require cut-and-fill activity to develop trailbeds which are sufficient for grooming activities to occur in the winter. If such activity were to occur on lands managed by a land management agency, the construction/expansion plan would be required to meet design specifications set forth by that agency. Cut-and-fill benches used for trails, parking lots, or building pads, would be designed to compliment topography and vegetation.

Cut-and-fill activities occurring on lands other than those managed by an agency, would require an environmental review document prepared by the Department (as identified in discussions of administration under Alternative 3 in Chapter 2). Because of this, there would be minimal impacts to topographic features. It would, however, require submittal of a design plan with specifications and construction guidelines.

Mass wasting (soil slumping, washouts, etc.) would not occur, as construction design plans and specifications would be subject to an environmental review by the Department (as described in the administration discussion under Alternative 3 in Chapter 2).

The Department concludes that impacts from trail and facility development and expansion projects under Alternative 3 to be negligible over the short and long terms.

SOILS

SUMMARY

Soil impacts would be associated primarily with early and late season snowmobiling in areas of insufficient snowcover such as trails on wind-swept ridges, south facing slopes, and wet meadow areas. Such activity could lead to a destabilization of soils and eventual erosion. Vegetation could also be destroyed in situations where revegetation success and biological productivity are low. Snow compaction and blockage of subsequent runoff could promote erosional forces that would alter soil stability and runoff characteristics.

Under Alternative 3, signing, avoidance and increased awareness on the part of early and late season snowmobilers would diminish the disturbance of exposed soils and decrease the impacts on erosion and productivity.

Alternative 1

Impacts to soil erosion and productivity from snowmobiling activities. (issue 3)

Surface disturbances related to early and late season snowmobiling have the potential to enhance the erosion and change the productivity of disturbed soils.

In early and late season snowmobiling, machines may have to access areas with good snow cover by crossing areas with little or no snow cover. When snowmobiles are operated on exposed or thinly covered soil, there is the potential for destabilization that may lead to increased erosion and decreased productivity. The potential for disturbance-related erosion effects is the highest on roads and trails, drainages and stream channels, and in drainage areas where sediment delivery efficiency is high. Disturbances in wet meadows and areas not within the trail system have the potential of not only increasing erosion, but destroying vegetation where revegetation success and biological productivity is, naturally, low.

The Department concludes that impacts to soil erosion and productivity from early and late season snowmobiling associated with Alternative 1 would be minor over the short and long terms

Impacts to soil erosion from snow compaction. (issue 3)

Compaction of snow on trails and other areas by grooming and snowmobile operations has the potential to change erosional characteristics. While soils have certain, inherent erosion hazards based on texture, location and slope gradient, compaction of the snow can alter erosion rates, along with how and where erosion occurs.

Compaction of snow can have the effect of prolonging the snow ripening and runoff processes and decrease the soil erosion associated with snowmelt and runoff. Since compaction is restricted to trails and areas used by snowmobiles, providing edges between compacted and uncompacted snow, runoff water may concentrate along the edges and develop sufficient energy to increase erosion.

The Department concludes that the impacts to soil erosion from snow compaction associated with Alternative 1 would be negligible to minor over the short and long terms.

Alternative 2

Impacts to soil erosion and productivity from snowmobiling activities.

Early and late season snowmobiling would continue with potential surface disturbance, and with related erosion and productivity impacts remaining at current levels.

The Department concludes that impacts to soil erosion and productivity from snowmobiling activities associated with Alternative 2 would be minor over the short and long terms.

Impacts to soil erosion from snow compaction.

While trail grooming would not be conducted with funding from the Snowmobile Grant Program, compaction of snow on trails and other areas would continue as an effect of snowmobiling, having the same impacts discussed in Alternative 1.

The Department concludes that the impacts to soil erosion from snow compaction associated with Alternative 2 would be negligible to minor over the short and long terms.

Alternative 3

Impacts to soil erosion and productivity from snowmobiling activities.

Early and late season snowmobiling would continue, with potential surface disturbance, and related erosion and productivity diminishing. Signing, avoidance, and increased awareness on the part of early and late season snowmobilers would diminish the disturbance of exposed soils, thereby decreasing the impacts on erosion and productivity.

The Agency concludes that impacts to soil erosion and productivity from snowmobiling activities associated with Alternative 3, would be negligible to minor over the short and long terms.

Impacts to soil erosion from snow compaction.

Compaction of snow on trails and other areas from funded groomers and snowmobilers would continue to have impacts as discussed in Alternative 1.

The Agency concludes that the impacts to soil erosion from snow compaction associated with Alternative 3 would be negligible over the short and long terms.

ROADS AND TRAILS IN PUBLIC LANDS

SUMMARY

The physical integrity of multiple use roads and trails could be impacted by erosional forces. These forces are caused by changes in snowmelt runoff patterns not planned for in the original design criteria. While the compacted snow protects the road or trail while it is in place, it retards melting rates further, relative to the infiltration capacity of soils--ensuring deep saturation and slow drying. Saturated roads and trails are susceptible to traffic induced damage that requires costly maintenance or repair. The concentration of runoff along the edges of compacted snow may increase erosion along the edge. The impacts remain unchanged under each Alternative.

Alternative 1

Impacts to the physical integrity of multiple use roads/trails from snow compaction. (issue 3)

As discussed in the impacts of Alternative 1 on Soils and Hydrology, the compaction of snow on roads, trails, and other areas accessed by snowmobiles, can effect the rate of snowmelt, runoff and soil erosion. Compaction of snow is planned by trail grooming; it also results from snowmobile operation.

Roads and trails on most public lands are managed for multiple use that includes activities requiring no snow cover. The roads and trails are designed to shed water, dry quickly, and prevent the concentration of runoff from adjacent and upgradient areas. Snow compaction slows the melting and runoff process, and as a result, the road or trail can not dry quickly. While the compacted snow protects the road or trail while it is in place, it retards melting rates further; relative to the infiltration capacity of soils--ensuring deep saturation and slow drying. Saturated roads and trails are susceptible to traffic induced damage that requires costly maintenance. The concentration of runoff along the edges of compacted snow may increase erosion along the edge. The compacted snow may also act as a barrier to the downgradient flow of runoff, thereby creating a pool that will eventually cut across and damage the road or trail. The pooling of runoff water also enhances the saturation of the road or trail soils where it occurs.

The Department concludes that the impacts from snow compaction to the physical integrity of multiple use roads and trails associated with Alternative 1 would be minor to moderate over the short and long terms.

Alternative 2

Impacts to the physical integrity of multiple use roads and trails from snow compaction.

While program related trail grooming would not influence the degree of snow compaction on roads and trails, snowmobiling would continue and the compaction of the snow by the machines would continue.

The Department concludes that the impacts from snow compaction to the physical integrity of multiple use roads and trails associated with Alternative 2 would be minor over the short and long terms.

Alternative 3

Impacts to the physical integrity of multiple use roads and trails from now compaction.

The compaction of snow on roads and trails as a result of trail grooming and snowmobile operation would continue.

The Department concludes that the impacts from snow compaction to the physical integrity of multiple use roads and trails associated with Alternative 3 would be minor over the short and long terms.

HYDROLOGY

SUMMARY

Snow compaction, as well as vegetation and soil disturbances caused by snowmobiling on insufficient snowcover, could impact runoff and discharge characteristics. Channel configurations could be altered by compacted snow across the direction of flow, or by erosional forces, causing changes in flow and discharge characteristics.

Water management could be impacted by snowmobile activities that 1) increase the potential for soil erosion, 2) change the melting and runoff characteristics of watersheds and 3) alter the discharge characteristics of stream channels.

Signs and increased awareness on the part of early and late season snowmobilers, would reduce the impacts on stream flow and discharge configurations, resulting in fewer impacts on water management efforts.

Alternative 1

Impacts to stream channels from snowmobiling activities. (issue 3)

Stream channels and bottom areas included in the snowmobile trail systems, or accessed by snowmobiles, have the potential of being impacted by snowmobiling activities. The physical disturbance and the compaction of snow across the direction of flow can alter the discharge characteristics of the channel.

Early and late season snowmobiling has the potential to disturb soils and vegetative cover in areas where there is little or no snow. When disturbance occurs in stream channels and adjacent bottom areas, it can alter roughness characteristics, expose soils that could erode and change the channel configuration, providing barriers or preferential pathways to water flow.

Compacted snow across the direction of flow in a stream channel could serve as a barrier to runoff until it has melted. Such a barrier could cause pooling and concentrate flows in general, creating a situation that results in the erosion and permanent change in the discharge characteristics of the channel.

The Department concludes that the impacts to stream channels from snowmobiling activities associated with Alternative 1 would be minor over the short and long terms.

Impacts to watersheds from snowmobiling activities. (issue 3)

Watersheds, or areas that provide runoff to stream channels in the snowmobile trail systems or other areas accessed by snowmobiles, have the potential of being impacted by snowmobiling activities. Physical disturbances to soils and vegetation and compaction of snow can impact the runoff characteristics of the watershed.

Although widetracked vehicles such as snowmobiles and groomers exert less vertical pressure on the snow surface than other transportation sources, early and late session snowmobiling has the potential to disturb soils and vegetative cover in areas where there is little or no snow. Disturbance could expose soils to erosion by runoff, thus providing barriers or preferential pathways that may change the runoff characteristics of the watershed.

Compacted snow can alter the runoff characteristics of a watershed. Compaction can slow the snow melt/runoff processes, encouraging infiltration of water into the soil. Compaction is not uniform over a watershed. This could result in edges that form between compacted and uncompacted areas which during melting, may concentrate runoff, enhance erosion, and create preferential pathways for subsequent runoff.

The Department concludes that impacts to watersheds from snowmobiling activities associated with Alternative 1 would be minor over the short and long terms.

Impacts to snow and runoff/water management from snowmobiling activities. (issue 3)

Snowmobiling activities that increase the potential for soil erosion, change the melting/runoff characteristics of watersheds, and alter the discharge characteristics of stream channels, all impact water management. Increasing the siltation rates in reservoirs and water bodies and changing the volume and temporal characteristics of runoff impose negative impacts on water managers and management plans (Dunne 1978). Snow compaction appears to have positive effects, in terms of slowing and regulating melting and runoff, but potential impacts to road and trail management, water management planning and recharge to surface water are not positive.

The management of the runoff from snowmelt is a critical component of overall surface water management. For example, a watershed or area that receives 30 percent of its annual precipitation as snow (water equivalent), produces 50 percent of its total annual runoff from that snow. During the period that runoff from snowmelt recharges water bodies and provides for instream flows, losses, including evapotranspiration are minimal, and a large percentage of the runoff reaches the water bodies. The remaining 70 percent of annual precipitation occurs as rainfall throughout the spring, summer, and fall seasons, producing the remaining 50 percent of the total annual runoff. The rainfall incurs large losses to interception, infiltration and evapotranspiration. Therefore, a smaller percentage of the precipitation (as compared to snowmelt) is discharged as runoff to recharge water bodies and stream flows. As snowfall accounts for larger percentages of the annual precipitation in an area, the management of runoff from the snow becomes more critical (Dunne 1978).

Activities that slow the snow melt/runoff processes or slow the discharge of the runoff, increase the potential for abstractions and losses that could decrease the volume of recharge to water bodies and stream flows.

The Department concludes that impacts to snow and runoff/water management from snowmobiling activities associated with Alternative 1 would be minor over the short and long terms.

Alternative 2

Impacts to stream channels from snowmobiling activities.

Although trail grooming would cease, compaction and early/late snowmobiling would continue, with the potential of altering the discharge characteristics of stream channels.

The Department concludes that the impacts to stream channels from snowmobiling activities associated with Alternative 2 would be minor over the short and long terms.

Impacts to watersheds from snowmobiling activities.

Although trail grooming would cease, compaction and early/late season snowmobiling would continue with the potential of altering the drainage and discharge characteristics of watersheds.

The Department concludes that impacts to watersheds from snowmobiling activities associated with Alternative 2 would be minor over the short and long terms.

Impacts to snow and runoff/water management from snowmobiling activities.

Although trail grooming would cease, compaction and early/late season snowmobiling would continue with the potential of negatively impacting runoff and water management plans.

The Department concludes that impacts to snow melt/runoff and water management from snowmobiling activities associated with Alternative 2 would be minor over the short and long terms.

Alternative 3

Impacts to stream channels from snowmobiling activities.

Snow compaction and early/late season snowmobiling would continue with diminished potential of altering the discharge characteristics of stream channels. Signs and increased awareness on the part of early and late season snowmobilers would diminish the disturbance of exposed soils and surface materials, thereby decreasing the impacts on stream channel characteristics.

The Department concludes that impacts to stream channels from snowmobiling activities associated with Alternative 3 would be negligible to minor over the short and long terms.

Impacts to watersheds from snowmobiling activities.

Snow compaction and early/late season snowmobiling would continue, with diminished potential of altering the drainage and discharge characteristics of watersheds. Signs and increased awareness on the part of early and late season snowmobilers would decrease impacts on watershed characteristics caused by the disturbance of exposed soils and surface materials.

The Department concludes that impacts to stream channels from snowmobiling activities associated with Alternative 3 would be negligible to minor over the short and long terms.

Impacts to snow and runoff/water management from snowmobiling activities.

Snow compaction and early/late season snowmobiling would continue, with diminished potential for negatively impacting runoff and water management plans. Signs and increased awareness on the part of early and late season snowmobilers would diminish the disturbances that change existing runoff characteristics and management plans. Snow compaction would continue to have the potential to impact runoff characteristics and water management.

The Department concludes that impacts to snow and runoff/water management from snowmobiling activities associated with Alternative 3 would be minor over the short and long terms.

WILDLIFE

SUMMARY

Studies on the impacts of snowmobile disturbance to wildlife offer a wide range of conclusions. Winter conditions, particularly where conditions are good for snowmobiling, can be harsh for many species of wildlife. Many of the earlier studies, largely of short duration and measuring overt responses, generally conclude that snowmobile activity has limited impacts to ungulate habitat and population distribution. However, more recent physiological studies which lend themselves to measuring more subtle responses, have indicated that snowmobile

activity could result in unnecessary stress and energy expenditure by the animals at inopportune times of the year. Exposure time and type of snowmobile activity (i.e. passing by vs. stopping, standing or walking, etc.) could have an influence on the degree of impact to the animals. As the level of snowmobile activity increases due to population increases, long term impacts will be greater than short term impacts under all alternatives.

Grizzly bears could be impacted if late season snowmobile activity is located near dens or in the proximity of ungulate wintering areas where bears commonly scavenge for carcasses upon emergence from hibernation.

Impacts under Alternative 2 would be similar in nature but more severe than those identified under Alternative 1. Limited funding and enforcement authority would encourage unregulated snowmobile activities in wildlife habitat.

Clearance oversight, avoidance, seasonal restrictions, and public awareness policies established in Alternative 3 would serve to provide minimal disturbance to wintering wildlife, thus reducing the potential impacts identified under Alternatives 1 and 2.

Alternative 1

With the apparent rapid increase in the popularity of snowmobiles in the 1960's, many wildlife wintering areas were invaded during seasons when previously little, if any, human activities had occurred. Consequently, concern was generated relative to the effect this influx of human activity may have on wildlife. This concern was brought forth in a series of studies initiated in the 1970's which were largely conducted in the Midwest, Northeast or in Canada (Neumann and Merriam 1972, Dorrance et al. 1975, Richens and Lavigne 1978). This geographic distribution of initial investigations probably reflected to a large degree, the distribution and degree of snowmobiling activity and its potential for impacting the wildlife resource. Although the sport has become increasingly popular in the mountain West, relatively few studies have been conducted to measure the impact of this activity on wildlife (Aune 1981, Freddy et al. 1986).

As one might expect, responses to snowmobiles by the more visible ungulates, particularly white-tailed deer, mule deer, and elk have received the greatest amount of study--although other disturbance studies have referenced moose (Ferguson and Keith 1982), pheasants (*Phasianus colchicus*)(Sodja 1978) and small mammals (Bury 1978). Concern has also been expressed in Montana regarding disturbance of grizzly bears as they emerge from dens in the spring.

Impacts to ungulate habitat, behavior, and population distributions. (issue 4)

While most studies of impact have looked at overt responses such as distances from the snowmobile--which will illicit flight response, and changes in home range size or habitat usage (Dorrance et al. 1975, Eckstein et al. 1976, Schultz and Bailey 1978), more recent studies have concentrated on physiological responses such as changes in metabolism and heart rate (Ward and Cupal 1980, Moen et al. 1982, Parker et al. 1984).

Overt responses by deer and elk varied between studies. Rost and Bailey (1979) reported that mule deer and elk avoided roads (vehicle traffic) in Colorado, especially a zone within 200 meters of the road. However, Eckstein et al. (1976) reported no significant difference in home range or habitat use areas by white-tailed deer as a result of snowmobile disturbance. Dorrance et al. (1975) found home range size, distance from trail and movements increased with snowmobile activity in an area which had been open to hunting but remained the same in an area closed to hunting. This suggests a certain degree of habituation by the deer to the protection of a no-hunting refuge system. The rapid habituation of both deer and elk to routine, mechanized (even noisy) activity is well documented (Loucks et al, 1990). Most western game management departments have spent considerable time and money trying to develop ways of scaring game animals away from certain sites, particularly during winter. Most methods tried have been abysmal failures.

Richens and Lavigne (1978), in a three winter study in Maine, found the use of trail systems significantly correlated with deer density and winter severity. Snowmobile disturbance did not cause deer to abandon preferred bedding and feeding sites. However, deer use of trails was inversely proportional to off-trail mobility and flight responses. Snowmobile trail use varied between winters, within winters, time of day (with less response as darkness approached), cover type, snow depth and sinking depth. McCool (1978) in his review paper reinforced this thought. He stated that many of the studies were of short duration and tied to a specific time and location. He emphasized they did not take into consideration the variables encountered over a longer time and under different geographical conditions.

Eckstein et al. (1976), Aune (1981) and Freddy et al.(1986), all indicated that persons afoot (nordic skiers) illicited greater flight response from wildlife than did snowmobiles. Wildlife responded by fleeing greater distances (Aune 1981), and grazing was interrupted for a longer period of time by people on foot (Freddy et al. 1986), than when disturbed by a snowmobile.

Stemp (1983), using heart rate as a measure, also indicated that vehicles approaching and passing were less disturbing to mountain sheep than human intruders and intruder with dog. However, he suggested that off-road vehicles moving about the gentler areas of sheep range may be very disturbing.

Considering the more subtle physiological responses to human disturbances, Moen et al. (1982) reported increased heart rate from 2.5 to 2.9 times in white-tailed deer, depending on the directed course of the snowmobile. They also found no evidence of habituation to the disturbance, either in magnitude of the heart rate response or to the time for a return to normal. Parker et al. (1984) pointed out the additional drain on wintering mule deer or elk by artificially induced locomotion, a drain which could be important to their survival on poor winter range. Ward and Cupal (1980) reported that based on heart rate, security cover was very important in dictating the distances of effective response by elk to human disturbance. This suggests that proximity to cover should be an important consideration in laying out snowmobile routes. MacArthur et al. (1982) in measuring heart rate changes in mountain sheep due to disturbances, reported that in most instances, overt and heart rate responses were quite similar in length. However, they felt that in a population of sheep less habituated to humans, a greater discrepancy would exist with heart rate increases lasting longer than overt responses.

The Department concludes that impacts to ungulate habitat, behavior, and population distributions under Alternative 1 would be moderate in the short term and major in the long term as the number of snowmobilers increases. In compliance with NEPA and/or MEPA, site-specific environmental reviews prepared for development and maintenance projects could conclude more significant impacts to a local resource as determined by the land management agency.

Impacts to grizzly habitat, behavior, and population distributions. (issue 4)

Cole (1972), reported that grizzly bears in Yellowstone Park emerged from hibernation and travelled to elk and other ungulate wintering areas between March and early May. Depending upon the availability of alternate foods, Mealy (1975) reported that elk may be an important spring food for grizzly bears. Houston (1978), in reporting on the elk as winter-spring food for carnivores in Yellowstone National Park, indicated that some carcasses near roads remained uneaten and attributed this to human disturbance. Snowmobile policy in Federal Parks is outside the scope of this document.

Recent studies of radio-collared grizzly bears have shown that females and females with cubs were generally found in high elevation habitats covered by snow from mid-October through mid-May. During post-denning periods, females with cubs are less mobile than other bears and remain near the den site from early April through mid-May. Thus high elevation snowmobiling during mid to late-spring could increase the potential for encounters with post-denning bears (Mace and Manley, Pers. Commun.).

The Department concludes that impacts to grizzly bear habitat, behavior, and population distributions under Alternative 1 would be minor in the short term, but in specific instances could become moderate to major in the long term as snowmobiling increases in popularity. In compliance with NEPA and/or MEPA, site-specific environmental reviews prepared for development and maintenance projects could conclude more significant impacts to a local resource as determined by the land management agency .

Impacts to other wildlife habitats, behavior, and populations distributions. (issue 4)

There are no available data concerning snowmobile impacts to wolves in Montana. In the event wolves become more widespread in Montana, they will most likely be found in association with wintering areas of mule and white-tailed deer and elk.

Physical alterations to winter habitat for small mammals living in subnivean habitats (beneath the snow) may be adequately adverse to result in ill health and increased mortality (Bury 1978). Neumann and Merriam (1972) showed that a loss of insulating qualities of snow on snowmobile trails would contribute to the above mentioned conditions for any of the species that use snow for protective and insulative cover.

Interaction between snowmobiles on official trails and wildlife other than wintering ungulates would be sporadic and unpredictable at best, and unlikely to pose a threat to any particular species. Poaching from snowmobiles is already covered by statute, whereas shooting game from motorized vehicles is prohibited, with certain exceptions.

The Department concludes that impacts to other wildlife habitat, behavior, and population distributions under Alternative 1 would be minor in both the short and long terms.

Alternative 2

Impacts to ungulate habitat, behavior, and population distributions.

Assuming no regulatory authority would exist to oversee wildlife management efforts associated with the Snowmobile Grant Program, impacts to ungulates would increase. Under this scenario, wardens would have less authority to enforce wildlife management directives that protect ungulates and their winter ranges from harassment and unnecessary disturbance from snowmobiles. Except where required by land management agency policy, no requirements would be in place to review trail plans and ensure against encroachment into sensitive winter ranges.

The Department concludes that impacts to ungulate habitat, behavior, and population distributions under Alternative 2 would be moderate to major in both the short and long terms.

Impacts to grizzly habitat, behavior, and population distributions.

Potential impacts to grizzly bears would increase as no precautionary measures would be required to limit access to hibernation areas or spring feeding areas. Early and late season snowmobile disturbances could result in dietary, displacement, or behavioral changes in grizzly bears. Game wardens would have limited authority to minimize indiscriminant disturbance or intentional harassment of the bears.

The Department concludes that impacts to grizzly bear habitat, behavior, and population distributions under Alternative 2 would be moderate to major in both the short and long terms.

Impacts to other wildlife habitats, behavior, and populations distributions.

Impacts to other wildlife would be similar in nature as those addressed under Alternative 1, although compounded by limited authority to prevent harassment or indiscriminant disturbance.

The Department concludes that impacts to other wildlife habitat, behavior, and population distributions under Alternative 2 would be minor to moderate in both the short and long terms.

Alternative 3

Impacts to ungulate habitat, behavior, and population distributions.

Modifications identified in Chapter 2 would reduce unnecessary stress or energy expenditures by animals at a time when it is least desireable. Habitat and behavioral changes would be limited and population distributions would be more stable with an established and enforced policy of environmental review, avoidance, and signing. An increased effort at making the public aware of potential conflicts between snowmobiling and wildlife may promote some self-policing among participants.

The Department concludes that impacts to ungulate habitat, behavior, and population distributions under Alternative 3 would be minor in both the short and long terms. Site-specific environmental reviews prepared for developing and maintenance projects could conclude more significant impacts to a local resource as determined by the land management agency in compliance with NEPA and/or MEPA.

Impacts to grizzly habitat, behavior, and population distributions.

Grizzly bears emerging from hibernation areas are in need of nourishment, which is provided by undisturbed feeding conditions. A policy of clearance oversight, avoidance, seasonal restrictions, idle zones, signing and public awareness would result in fewer impacts to these bears. Such a policy would also minimize snowmobile-grizzly-wolf interactions, as both grizzly bears and wolves both scavenge and hunt ungulates, as do mountain lions.

The Department concludes that impacts to grizzly bear habitat, behavior, and population distributions under Alternative 3 would be minor in both the short and long terms. However, in compliance with NEPA and/or MEPA, site-specific environmental reviews prepared for developing and maintenance projects could conclude more significant impacts to a local resource as determined by the land management agency.

Impacts to other wildlife habitats, behavior and population distributions.

Avoidance, signing, clearance oversight, and public awareness policies would help reduce unnecessary snow compaction. Compaction could disturb harsh survival conditions for species which depend upon undisturbed snow for cover and insulation (i.e. small mammals and some grouse species). Increased enforcement would ensure against harassment of wildlife by snowmobiles and other winter recreationists.

The Department concludes that impacts to other wildlife habitat, behavior, and population distributions under Alternative 3 would be minor in the short and long terms.

VEGETATION

SUMMARY

Impacts to vegetation on existing prepared roadbeds would be non-existent. Snow depths, and the amount, frequency, and duration of trail use determine the level of impacts on trails constructed in areas of established vegetation. Impacts in the form of mechanical breakage and abrasion could be caused by striking exposed vegetation on the trail (i.e. saplings, tops of larger trees, etc.). Herbaceous vegetation would be impacted in areas with insufficient snowcover such as ridge lines, southern exposures, and early and late season snow depths.

With the development of new trails, noxious weeds could be introduced by the physical transfer of seeds on snowmobiles. In addition, if large game animals were to be displaced from a traditional winter range by snowmobile related *activity, concentrated browsing, foraging, resting, and breeding activities in the areas of relocation could cause vegetative carrying capacities to be exceeded.*

Under Alternative 3, signing, avoidance, and increased awareness on the part of early and late season snowmobilers would diminish the disturbance on vegetation.

Alternative 1

Impact to vegetation on trails traversing existing prepared roadbeds. (issue 5)

The utilization of existing prepared roadbeds, such as forest service roads, logging roads, and other graded roadbeds would serve to minimize the impact of snowmobiling on vegetation within the trail boundary.

The agency concludes that impacts to vegetation on trails traversing existing prepared roadbeds would be negligible to minor over the short and long terms.

Impact to vegetation and habitat on trails traversing areas with vegetative cover. (issue 5)

Impacts to vegetation increase when trails are constructed on areas with established vegetative cover. The amount and degree of direct impacts is dependant on several factors such as snow depth, amount, frequency, and duration of trail use, and the type and amount of vegetation underlying the trail.

In general, there can be direct damage to vegetation due to snowmobile use. Snowmobiles can affect natural regeneration areas and tree plantations containing small trees, saplings, and other vegetation with living portions above snow level in the trail. This damage is often due to mechanical breakage and abrasion, although there is the possibility of damage to portions of the plant below the snow surface due to machine weight (Nuemann and Merriam, 1972). Direct impacts to herbaceous vegetation from breakage and abrasion should be minimal under adequate snow conditions (Pesant, 1987; Ryerson et al., 1977; and Foresman et al., 1976).

Other potential impacts to vegetation and habitat include mechanical damage to vegetation and soils on areas with little or no snow cover--i.e. wind-blown ridge tops, areas with bare patches due to snow melt, and areas receiving little snow fall.

The potential of introducing noxious weeds or other plant species not native to a particular area is increased by improved access to areas not previously used by snowmobilers. Weed seeds, with seedheads near or above snow level, may become attached to the machines while passing through an area, and later deposited far from its original site. Control and spread of noxious weeds is a major concern in Montana for both ecological and economic reasons.

Indirect impacts may occur in areas adjacent to, as well as away from, the trail boundary. "Play" areas, such as basins, valleys, and other open areas, to which trails may lead, can contain vegetation types that are sensitive to snowmobile use. Negative impacts to vegetation in these areas may be a result of easier access provided by improved trail conditions. Avoidance of trail areas by wildlife (Simpson, 1987; Nuemann and Merriam, 1972) may cause animals to congregate in other areas resulting in over-utilization of forage sources in localized areas away from a trail system.

Snowmobile trails may also have less direct impacts on vegetation and habitat through their effect(s) on organisms which use vegetation for feed and cover. In the case of larger game animals, browsing, foraging, resting, and breeding activities can dramatically alter vegetation composition, cover, and vigor. If animals are displaced from a traditional use area by a new snowmobile trail, their activities may be concentrated on other areas. If such concentration exceeds the carrying capacity of these areas, damage to vegetation and soils may occur. In the case of smaller animals, such as rodents including voles, moles, gophers, and ground squirrels, snowmobile activity off of developed roadbeds may limit rodent activity. This is due to compaction of snow and formation of ice above and below ground (Schmid, 1972). As rodent activity is a normal aspect of many mountain ecosystems, a reduction in their activity may adversely affect vegetation and soil function.

Effects on phenology and vigor characteristics of plants are possible if the subnivean environment under snowmobile-caused snow compaction is altered (Evans and Fonda, 1990; Foresman et al., 1976; Hogan, 1972; Neumann and Merriam, 1972). This could lead to shifts in species composition (Evans and Fonda, 1990) and/or changes in plant density on a given unit of trail (Ryerson et al., 1977). Delayed snowmelt from trails may provide moisture over a longer period of time to vegetation in the immediate vicinity of the trail and other areas of snowmobile use (Pesant, 1987; Hogan, 1972; Nuemann and Merriam, 1972). Changes in moisture release patterns may directly alter the phenology of vegetation.

If the program is continued in its current form, at its present level of administration and regulation, there is potential for adverse impacts to vegetation and habitat. These impacts may be both direct and indirect, and may or may not be easily predicted under the current program.

The Department concludes that the impacts to vegetation and habitat with trails traversing areas of vegetative cover under Alternative 1 would be minor to moderate in the short and long terms.

Alternative 2

Impact to vegetation on trails traversing existing prepared roadbeds.

Grooming activities funded by the Snowmobile Program would cease, but utilization of existing prepared roadbeds by snowmobiles would continue under Alternative 2. Impacts on these roads would continue as identified in Alternative 1.

The agency concludes that impacts to vegetation on trails traversing existing prepared roadbeds, under Alternative 2 would be negligible to minor over the short and long terms.

Impact to vegetation and habitat on trails traversing areas with vegetative cover.

If the Snowmobile Grant Program was to be discontinued, there would be potential for more severe adverse impacts to the vegetative resource. Elimination of the Snowmobile Trail Program and its regulatory functions could lead to far more trailing through given areas, dispersing any negative impacts over a greater area. Lack of grooming, signing, and other measures of route controlling could lead to damage of vegetation on trail boundaries. Sensitive environments, especially at higher elevations, would be the first to evidence negative impacts.

The Department concludes that impacts to vegetation and habitat under Alternative 2 would be minor to moderate in the short and long terms.

Alternative 3

Impact to vegetation on trails traversing existing prepared roadbeds.

Utilization of existing prepared roadbeds by snowmobiles and grooming equipment would be encouraged under Alternative 3. Utilizing prepared roadbeds would draw impacts away from vegetated areas where sensitive vegetation could be impacted.

The agency concludes that impacts to vegetation on trails traversing existing prepared roadbeds would be negligible over the short and long terms.

Impact to vegetation and habitat on trails traversing areas with vegetative cover.

Continuing the program and requiring more information on grant applications could provide a means of identifying any potentially sensitive habitats or conditions, thus providing means for implementing mitigative measures. Requiring further information on vegetation types and habitats to be traversed, land forms the trails will encounter, potential for spread of noxious weeds, and potential for encountering rare and endangered species, would assist in minimizing impacts to the vegetative resource within the trail system.

The Department concludes that impacts to vegetation and habitat under Alternative 3 would be negligible to minor in the short and long terms.

SOCIOECONOMIC

SUMMARY

The Snowmobile Grant Program would provide economic benefits to the State of Montana under each alternative by promoting and providing for a structured system of trails designed for both in-state and out-of-state recreationists. Income to recreation-based winter communities would be generated from direct program related employment and snowmobile related spending activities such as fuel supplies, motels and restaurants.

Snowmobilers and those individuals associated with the sport would realize positive social impacts from the Snowmobile Grant Program through enjoyment of the sport and because of the promotion of safety, law enforcement, and trail grooming. Non-motorized recreationists seeking quiet, peaceful recreation could be impacted by disturbances associated with snowmobiling activities (see also Recreation section).

> *Negative social impacts would be reduced under Alternative 3. Policy changes could provide for restrictions on impactive activity as identified in Aesthetic and Recreation discussions.*

Alternative 1

Economic impacts. (issue 6)

The economic benefits to state and local economies would continue at present rates. Direct economic benefits to local snowmobile associations would continue through the grants award program, which amounts to approximately $250,000 per year. Presently, and it is expected to continue, 25 full-time persons work during the winter on trail grooming.

Indirect benefits for many smaller communities would continue to be realized through the promotion of snowmobiling and the continued growth of snowmobiling as a wintertime economy. Based on recent studies, an estimated 20,000 nonresident snowmobilers will travel to Montana, with an average stay of 5.4 days. Nonresident snowmobilers will spend about $15.3 million in Montana throughout the snowmobile season. The snowmobiling consumer from out-of-state could generate labor income of about $3.8 million which would create approximately 350 jobs.

The Department concludes that negative economic impacts to the state and recreation based winter communities under Alternative 1 would be negligible over the short and long terms.

Social impacts. (issues 6 &8)

Social benefits from this alternative would continue at their present levels. Besides promoting a healthful lifestyle, snowmobiling provides opportunities that can be enjoyed in both family and multi-family settings. Average group sizes for both resident and nonresident snowmobilers average about 5 to 6 persons (University of Montana, Bureau of Business and Economic Research, Fall 1988). In addition, snowmobile clubs throughout the state promote community activities such as family days, Race-To-The-Sky Dog Sled Races, and an event for The Multiple-sclerosis Foundation-- all with positive social outcomes.

Encroachment on private property can impact local residents, businesses, industrial and agricultural operations. Encroachment problems could be due to a lack of awareness, lack of signing, or simply negligence on the part of the snowmobiler. Other negative impacts could include driving while intoxicated, speeding, and not staying on designated routes.

The Department concludes that negative social impacts to the state and recreation based winter communities under Alternative 1 would be minor to moderate over the short and long terms.

Alternative 2

Economic impacts

Under this alternative, snowmobile associations would lose their funding for trail grooming, safety promotion, and law enforcement, causing many clubs to face serious financial hardships in trying to keep trails groomed and useful. Local clubs would lose the funding for trail grooming ($250,000 per year), thus decreasing employment during the winter by an estimated 25 full-time jobs. Indirectly, the economy supported by the Snowmobile Program would also suffer, as snowmobilers found fewer trails available and groomed, and less law enforcement and safety promotion.

The Department concludes that negative economic impacts to the state and recreation based winter communities under Alternative 2 would be moderate to major over the short and long terms.

Social impacts

Persons relying upon the Snowmobile Program to assist in trail grooming would lose a source of funding with this alternative, potentially causing anxiety among this group of people. Some grant recipients would reduce or stop trail grooming efforts as a result of this alternative. The social well-being of those people who use snowmobiling as a source of outdoor recreation in the winter may be affected. In addition, if less money is made available to snowmobile organizations because of the discontinuation of the program, the snowmobilers who rely on local snowmobile clubs for group outings or charity activities may have to seek other alternatives.

Social impacts identified under Alternative 1 would be similar in nature but more severe and widespread under Alternative 2. Without signing and enforcement efforts funded by the snowmobile program, such impacts would continue uncontrolled and without regulated means of improvement.

The Department concludes that negative social impacts to the state and recreation based winter communities would be moderate over the short and long terms.

Alternative 3

Economic impacts

The impacts to the economy under this alternative would be similar to Alternative 1. The exception may be that, should the implementation of proposed rules and stricter controls increase administration costs of the Snowmobile Program, there may be fewer funds available from the program to directly assist local snowmobile associations in grooming trails.

The Department concludes that negative economic impacts to the state and recreation based winter communities under Alternative 3 would be negligible to minor over the short and long terms.

Social impacts

Modifying the Snowmobile Program to require additional information, conditioning approval of grants, or more administrative control, would be opposed by many current participants of the program. An opinion survey of snowmobile clubs indicated that most do not favor any changes to the program. Some members of the public may consider additional administrative control of grant projects to be positive measures that help ensure compliance with existing rules.

A planning, signing, public awareness, and enforcement policy as discussed under this alternative would reduce the impacts identified under Alternatives 1 and 2.

The Department concludes that negative social impacts to the state and recreation based winter communities under Alternative 3 would be negligible over the short and long terms.

CULTURAL

SUMMARY

Impacts to cultural resources would be those associated with 1) trail construction, 2) snowmobile and grooming activities on areas of insufficient snowpack, and 3) intentional vandalism. Trail construction would disturb surficial and shallowly buried archaeological sites as well as interrupt the visual integrity of historic sites. Snowmobile and grooming activities could impact the integrity and character of historic trails by the clearing of vegetation or by erosional influences caused by compacted snow. Access provided by funded snowmobile trails could lead to indiscriminant or intentional damage to historic structures.

Impacts under Alternative 3 would be reduced through improved cultural evaluations on proposed trails as determined necessary by the Department.

Alternative 1

Impacts to prehistoric and historic resources on existing, motorized vehicle trails or roads from snowmobile related activities. (issue 7)

Development of snowmobile trails on existing motorized vehicle trails or roads would have no impact on prehistoric or historic resources. In this case, impact considerations for cultural resources would be unnecessary. If snowmobile trail development were to extend beyond the existing trail prism, then cultural resource investigations would be necessary, even on extant motorized trails. The age of motorized vehicle trails must be determined. If the trail is over 50 years old, then its context must be investigated to determine historic significance as discussed in Appendix D.

The Department concludes that under Alternative 1 cultural impacts to prehistoric and historic resources on existing motorized vehicle trails would be negligible in the short and long terms.

Impacts to prehistoric and historic resources on historic motorized vehicle trails or roads from snowmobile related activities. (issue 7)

Trail grooming and maintenance may alter the character of historic trails which have fallen into disuse but still retain historic integrity. Removal of trees and other vegetation can be viewed as degrading to the integrity and visual quality of a trail. Trails not currently in use are likely to have revegetated, and reopening them to snowmobiling could destroy that stabilizing vegetation. Reduction of, or destruction of, vegetation could result in exposing a trail to the degrading affect of erosion. Some compaction of trail soils could also occur on historic trails.

The Department concludes that impacts under Alternative 1 to prehistoric and historic resources on historic motorized vehicle trails or roads would be negligible to minor over the short and long terms.

Impacts to archaeological sites along new snowmobile trails and reroutes. (issue 7)

A variety of impacts to archaeological sites could be expected along new snowmobile trails and reroutes. Some impacts are direct and result from trail construction, maintenance, and grooming. Other impacts are indirect and result from a variety of activities.

The Montana State Historic Preservation Office (SHPO) requires consideration of auditory and visual impacts or intrusions of developments to certain site types. Historic sites and Native American sacred and traditional sites are particularly sensitive to such impacts. Snowmobile traffic could result in auditory intrusion to Native American traditional sites. The noise level from engine operation could be substantial carry some distance from the actual trail. Trail construction could be an intrusion to the viewshed of historic structures, interfering with visual integrity to the setting. The SHPO advises that the lead agency in a project confer with them, on a case by case basis, prior to undertaking a cultural resource survey in order that adequate survey corridor for auditory and visual intrusions can be established.

Any grading of snowmobile trails would disturb surficial archaeological sites and shallowly buried archaeological sites. Spacial integrity would be destroyed by such construction. Lithic scatters, tipi rings, buried campsites, cairns, rockpiles, alignments, effigies, medicine wheels, burials, vision quest structures, pit houses, and historic structures could be negatively affected by trail construction.

Heavy snowmobile traffic on a trail (grooming and recreation) could result in soil compaction, although trail use most often occurs during months when soil is frozen and less susceptible to compaction. Compaction could result in deformation of buried cultural strata, thereby disturbing or destroying spacial context.

Erosion could also become a problem along the trail route. Erosion could result in destruction of a site's spatial integrity as artifactual materials are weathered out of place.

Construction of new trails often requires removal of trees and clearing of vegetation. Scarred or cambium peeled trees could be destroyed by such activity. Native American sacred and medicinal plant collecting areas could also be affected. Wickiups and timbered lodge structures could be destroyed or disturbed by trail clearing.

Because of the size and visibility of stone quarries and rock art sites, they are susceptible to certain indirect affects as well as direct impacts. Increased accessibility to areas which might contain these site types could result in vandalism.

Standing historic structures also become exposed to vandalism with increased traffic in an area. A particular problem in the past has been the destruction of historic buildings for use in campfires and warming fires by winter recreationists.

Signing of snowmobile trails could also result in small scale disturbance to archaeological sites. Excavation of holes for sign posts could destroy context for surface and subsurface cultural materials.

In general the biggest potential impact to cultural resources from indirect impacts or trail-development associated action relates to increased accessibility into areas containing sites. Standing historic structures and archaeological sites highly visible during winter months would receive greater exposure to recreationists and the possibility of vandalism would likely increase.

The Department concludes that impacts to archaeological sites along new snowmobile trails and reroutes under Alternative 1 would be minor to moderate over the short and long terms.

Alternative 2

Impacts to prehistoric and historic resources on existing, motorized vehicle trails or roads from snowmobile related activities.

The use of snowmobiles on existing, motorized vehicle trails or roads, would have no impact on prehistoric or historic resources.

Impacts to prehistoric and historic resources on historic motorized vehicle trails or roads from snowmobile related activities.

Impacts to prehistoric and historic resources on historic motorized vehicle trails that are found on lands managed by a land management agency would be minimal as those agencies would require cultural investigations. On private lands, the impacts would be greater since there would be no requirements for cultural investigations on such lands.

The Department concludes that under Alternative 2, impacts to prehistoric and historic resources on historic motorized vehicle trails or roads would be minor over the short and long terms.

Impacts to archaeological sites along new snowmobile trails and reroutes.

No funded trails would exist without the Snowmobile Grant Program, therefore impacts to archaeological sites would be dispersed throughout the individual areas and limited to non-funded trails established through volunteers or other programs that are beyond the scope of this PEIS.

The Department concludes that impacts to archaeological sites along new snowmobile trails and reroutes could be minor to moderate in the short and long terms.

Alternative 3

Impacts to prehistoric and historic resources on existing, motorized vehicle trails or roads from snowmobile related activities.

Snowmobiling would continue with little to no impact on prehistoric or historic resources. In this case, impact considerations for cultural resources would be unnecessary. If snowmobile trail development were to extend beyond the existing trail prism, then cultural resource investigations would be necessary, even on extant motorized trails.

The Department concludes that under Alternative 3, impacts to prehistoric and historic resources on existing, motorized vehicle trails or roads to be negligible in the short and long terms.

Impacts to prehistoric and historic resources on historic motorized vehicle trails or roads from snowmobile related activities.

Snowmobiles would continue utilizing existing trails, some with the potential to contain prehistoric and historic resources. Impacts to these resources would diminish however, with improved requirements for cultural evaluations as identified by the Department under cultural resource protection policy established under Alternative 3.

The Department concludes that under Alternative 3, impacts to prehistoric and historic resources on historic motorized vehicle trails or roads would be negligible to minor over the short and long terms.

Impacts to archaeological sites along new snowmobile trails and reroutes.

Impacts to archaeological sites along new snowmobile trails and reroutes would be similar to those identified under Alternative 1, but impacts would be diminished as a result of improved requirements for cultural evaluations as identified by the Department under a cultural resource protection policy established under Alternative 3.

The Department concludes that under Alternative 3, impacts to archaeological sites along new snowmobile trails and reroutes would be negligible to minor over the short and long terms.

AESTHETICS

SUMMARY

With the exception of areas inflicted with poor air quality, visual impacts would typically be greatest in areas with high scenic quality and few man-made developments. These impacts would be related to visual intrusions from snowmobile activity on non-motorized recreationists seeking quiet enjoyment of Montana's many back-country areas. Positive impacts are also realized by snowmobilers who have the opportunity to access Montana's back-country areas.

Impacts on visual resources are viewed very subjectively by different individuals, thus it is difficult to assess specific impacts on anything but an individual basis.

Negative visual impacts would be diminished under Alternative 3 with improved trail location strategies, waste management strategies and improved public awareness.

Noise impacts would occur both on and adjacent to funded snowmobile trails and in recreation based winter communities. Noise levels from snowmobiles in the back-country could be disruptive to non-motorized recreationists. Noise levels in communities from increased concentration of snowmobile activity could impact residents and the non-snowmobiling public.

A policy calling for a combination of mitigating measures would reduce the level of noise related impacts under Alternative 3. Public awareness programs, avoidance areas and time schedules would help reduce the level of noise impacts.

Alternative 1

Impact on visual resources. (issues 9 & 10)

The magnitude of impacts on visual resources is influenced by landscape, climatic conditions, the nature of the viewers, density of snowmobile activity and vegetation. Visual impacts can be classified into three distinct categories: 1) obstructed views of surrounding vistas resulting from poor air quality in areas of high density snowmobiling (communities, resorts, major trail junctions, etc.) 2) interrupted views of pristine/back country by snowmobiles on and near trails 3) indirect positive impacts resulting from opportunities provided by snowmobile trails for viewing back-country vistas

Poor air quality resulting from temperature inversions in areas of high snowmobile density can obstruct visual enjoyment of scenic conditions that are associated with most snowmobiling communities and trails across Montana. The impacts decrease proportionally with distance from the higher density areas.

Trails provide corridors for snowmobilers to get from one area to the next. Many of these trails utilize existing logging, Forest Service, or other access roads as primary routes. These trails could pass through areas with little vegetative screening, making them more visible to observers. Occasionally, these trails are visible from clearings or from other less developed trails being used by non-motorized recreationists. For these visual observers, the sight of snowmobiles using developed trails and open areas can be disturbing to their enjoyment of the visual quality of an area.

Many snowmobilers utilize their machines to access areas of high visual quality. Physically limited individuals, who otherwise could not enjoy such areas, are provided the opportunity through snowmobiling. For these individuals, snowmobiling provides a means to a positive visual experience, therefore creating a positive visual impact.

The Department concludes that impacts to visual resources of an area from the Snowmobile Grant Program under Alternative 1 to be minor over the short and long-terms.

Impact of snowmobile noise levels. (issues 9 & 10)

Noise impacts range from intense levels at which hearing can be quickly impaired, to long-term background noise that disrupts night-time sleep. The severity of noise impacts greatly depend on types of snowmobiles, numbers of snowmobiles, types of snow surface, wind, distance from auditory sensor, vegetation types and temperature (Bollinger, and Rongstad et al.).

Snowmobiles manufactured prior to June 30, 1972 must only have a muffler originally equipped by the manufacturer. Machines manufactured between June 30, 1972 and June 30, 1975 must have original muffling equipment no louder than 82 dbA measured at 50 feet. Snowmobiles manufactured after June 30, 1975 must have original muffling equipment no louder than 78 dbA at 50 feet. Although noise levels of newer snowmobiles have been significantly reduced, (in many cases outputs of less than 73 dbA are possible) (OPRHP 1992), older machines are still common on Montana's trail systems and contribute to increased noise levels along trails and in communities.

Snowmobilers often travel in groups of two or more and can be found clustered together when travelling on groomed trails. The greater the number of snowmobiles passing a given point, the greater the noise level at that point. However, the actual level depends greatly upon the type, speed, and total number of machines passing the auditory location.

Other factors that influence the impacts associated with noise levels are closer proximities, decreasing amounts of vegetation, hardpacked snow, decreasing wind, colder temperatures, steeper/closer topography, and increased rates of acceleration (Raedeke, and Taber 1983).

One or all of the above factors contribute to noise levels and can be combined to create varying degrees of noise related impacts. Trails with low snowmobile usage, generally exhibit short-term impacts of low significance. However, in town, snowmobile densities are often greater, there is less vegetation, less wind, more hardpacked snow, and more acceleration associated with moving from one area to the next. The significance of these impacts depends greatly upon the nature of the individual listening to the noise.

Most snowmobilers are involved in the sport by choice--therefore, negative impacts resulting from noise levels associated with riding snowmobiles are limited to temporary threshold shifts in hearing. In some cases there is long-term hearing damage due to close proximity with the snowmobile and its muffler. These impacts are especially prominent with riders of older or modified machines with sound levels above 82 dbA (Raedeke 1983).

The primary element of the snowmobile noise issue is its affect upon others, especially at night when noise is exaggerated. Residents of winter recreational communities regularly expect noise levels to increase in the winter. However, many individuals are attracted to these communities in search of the quiet ambience not found in larger cities. For these people, the noise of a snowmobile, that could otherwise pass unnoticed in a situation of elevated background noise levels, can become a tension producing irritant. Snowmobiling, especially at night, has the potential to invoke a loss of sleep in some people. In such cases, it has been documented that sleep deprivation can produce extreme muscular weakness, explosive irritability, dreaming while awake, and other symptoms (Baldwin, 1973).

The Department concludes that impacts associated with noise under Alternative 1 would be moderate in the short term and minor in the long term.

Alternative 2

Impact on visual resources.

Impacts to visual resources under Alternative 2 would be similar in nature but more widespread than those associated with Alternative 1. Without organized grooming activities funded by the snowmobile program, snowmobilers would have less incentive to remain on groomed trails. Off-trail riding would increase, thereby dispersing impacts to areas more sensitive to visual intrusions by snowmobilers. Fewer opportunities would exist for non-motorized recreationists to use areas that, under Alternative 1, would be less visually impacted.

Visual impacts to communities and resorts from associated air pollution would continue as identified in Alternative 1. These impacts could possibly increase due to the absence of groomed trails as destinations for snowmobilers. More time could be spent in the communities travelling on packed streets and local access roads.

The Department has determined that the impacts of the Snowmobile Grant Program on visual resources under Alternative 2 would be minor to moderate in the short and long terms.

Impact of snowmobile noise levels.

Noise impacts under Alternative 2 would be similar to those associated with Alternative 1, however more severe and widespread. Under this alternative, organized grooming activities would not occur to the extent warranted under a funded program. Without groomed trails, snowmobilers would have less incentive to remain on existing trails, thereby increasing off-trail riding, and dispersing the impacts of noise into areas that, under Alternative 1, are less susceptible to disturbance by snowmobiles.

Impacts from increases in noise in residential areas or within community boundaries would increase as discontinuance of the program would eliminate funding for enforcement of noise regulations.

The Department has determined that noise impacts of the Snowmobile Grant Program on under Alternative 2 would be moderate in the short and long terms.

Alternative 3

Impact on visual resources.

Because landscape, climatic conditions, nature of the viewers, density of snowmobile activity, and vegetation all serve to influence the magnitude of impacts on visual resources, one or a combination of them will likely occur, causing some observers to be affected by visual impacts. Under Alternative 3, however, information required in the application would provide design specifications and an outline of proposed steps to minimize impacts on visual resources. Specific design guidelines incorporated into the plans of operation would include the development and usage of trails incorporating vegetative screening as much as possible, and the avoidance of ridge lines, open meadows, and exposed slopes. Trail routes would be designed to avoid key non-motorized recreation areas. Stepped up enforcement would be provided to ensure against encroachment on non-motorized areas such as designated ski routes, and designated roadless and wilderness areas.

Localized visual impacts due to poor air quality in and around high density use areas, such as communities and resort areas, would continue under Alternative 3. These impacts could be reduced by implementing two courses of action. First, a public awareness program, directed at community residents and snowmobilers, would be implemented to emphasize the importance of reducing degrading air emissions. The program would emphasize such actions as 1) limiting cold starts by storing machines in warm storage facilities, 2) spending less time in town with engines idling before leaving for trails, 3) keeping machines tuned properly and 4) issuing inversion warnings to increase awareness of climatic conditions that lead to air quality and visibility problems.

Second, because air quality problems stem, in part, from snowmobile emissions, Alternative 3 would emphasize the need for grant recipients to work with public agencies and MSA representatives to encourage research and development of new technologies aimed at reducing snowmobile emissions.

All proposals for operation and maintenance as well as development and expansion projects would be subject to the appropriate environmental review as described under administration of Alternative 3 in Chapter 2.

The Department has determined that impacts resulting from the Snowmobile Grant Program on visual resources under Alternative 3 would be negligible to minor in the short and long terms.

Impact of snowmobile noise levels.

Noise impacts similar to those described for Alternative 1 would occur under Alternative 3 and would range from impaired hearing to disruption of sleep and increased stress levels. Although many of the factors that influence the severity of these noise impacts (types of snowmobiles, numbers of snowmobiles, types of snow surface, wind, distance from auditory sensor, vegetation types, topography and temperature) cannot be controlled, steps would be taken that could result in their overall reduction.

Average noise levels from snowmobiles would be reduced by increasing enforcement on stock and modified machines that surpass maximum state sound levels. Public awareness programs would be established that would educate the public on proper maintenance of snowmobiles and impacts of elevated noise levels on humans and animals.

Alternative travel routes or time schedules established through residential neighborhoods and other sensitive areas could be implemented and enforced. By controlling travel through residential and sensitive areas, less impacts would occur to occupants of these areas. Levels of sleeplessness, irritability and stress would decrease, resulting in overall improved health and well being.

Support for research and development of new technologies, directed at establishing regulations for snowmobile noise levels, would have long term positive impacts on the level of noise in recreation based winter communities and along funded snowmobile trails.

The Department concludes that impacts from noise under Alternative 3 would be minor in the short term and negligible in the long term.

RECREATION

SUMMARY

Recreational impacts are limited to trail use conflicts associated with shared use of trails and disturbance of non-motorized recreationists who are within visual and audible range of established trails and non-funded "play areas", as well as possibly causing their displacement from these areas. The opportunity provided by funded snowmobile trails would result in positive recreational impacts to in-state and out-of-state snowmobilers.

The impacts associated with trail conflicts and disturbances to non-motorized rereationists would be reduced by 1) avoidance, 2) signing, 3) public awareness, and 4) hourly restriction policies included in Alternative 3. Recreational opportunities for the snowmobiling public would continue under this alternative.

Alternative 1

Direct impacts associated with the continuation of the Snowmobile Grant Program would be trail usage conflicts and sustained recreational opportunities. *(issues 8, 9 & 10)* Groomed snowmobile trails are often utilized by non-motorized recreationists (cross-country skiers, snowshoers, etc.) to reach areas such as basins and remote trails, that are not easily accessible without the travel corridors provided by the snowmobile trails. Conflicts could occur as snowmobilers encounter non-motorized recreationists on the groomed trails. If non-motorized recreationists are unable to quickly provide for safe passage of high velocity snowmobiles, injuries could occur to either party involved. Under the existing program, no provisions allow for coordinated usage of trails for both motorized and non-motorized users.

Trails funded and maintained under the Snowmobile Grant Program provide for increased recreational opportunities for both in-state and out-of-state individuals and families. Established trails provide the means by which snowmobilers can access and enjoy Montana's back-country areas. This enjoyment can lead to increased tourism and economic benefit to

Montana's recreation-based winter communities, as discussed in the socioeconomic discussions in this chapter.

Indirect impacts associated with the continuation of the Snowmobile Grant Program would include off trail riding and disturbance of non-motorized recreationists within visual and audible range of established trails.

Non-motorized as well as motorized recreationists choose to recreate in mountainous areas because of the natural setting, pristine environment and minimal use restrictions. Non-motorized recreationists however, draw enjoyment from the peace and quiet often associated with these areas. This solitude can be disrupted with the passage of snowmobiles within visual or audible range of the non-motorized recreationist. Such disturbances can impact greatly on an individual's enjoyment of the area, and his/her attitude toward snowmobiles and other motorized recreational opportunities. This disturbance may also cause the displacement of some non-motorized users from areas that previously had no groomed trail systems and little motorized activity.

The Department has determined that recreational impacts resulting from the Snowmobile Grant Program under Alternative 1 would be minor in the short and long terms.

Alternative 2

Discontinuation of the existing Snowmobile Grant Program would result in an increased level of direct and indirect recreational impacts. Recreational impacts under Alternative 2 would be similar in nature but more widespread than those identified in Alternative 1. Without a groomed system of trails, snowmobilers would have little incentive to utilize travel corridors that were designed to minimize usage conflicts between motorized and non-motorized recreationists. Snowmobilers would travel in a more dispersed manner throughout the region, thereby increasing encroachment into areas valued as non-motorized recreational areas.

The Department has determined that recreational impacts resulting from the Snowmobile Grant Program under Alternative 2 would be moderate in the short and long terms.

Alternative 3

Direct impacts to recreational opportunities associated with a modified program would be limited to occasional trail usage conflicts along trails established under the Snowmobile Grant Program. These conflicts would be minimized through improved trail location strategies and signing programs. Non-motorized recreationists would continue to utilize existing trails to some degree. However, impacts would be minimized through cooperative planning efforts between the two interest groups. Non-motorized recreationists would have less disturbance than would be experienced in congressionally designated wilderness study areas and designated non-motorized areas under Alternatives 1 and 2.

Opportunities for snowmobile recreation would continue under Alternative 3 because the mitigating measure established under this alternative would provide for safer snowmobiling along all trails and in areas of increased use by non-motorized recreationists. Snowmobilers would be restricted from riding trails in congressionally designated wilderness study areas and designated non-motorized areas. This could result in fewer trail riding opportunities.

Indirect impacts would include off trail riding and disturbance of non-motorized recreationists within visual and audible range of the established trails. Impacts to non-motorized recreationists would exist under Alternative 3, but at a reduced level because of improved trail planning strategies. These strategies would be designed to avoid areas of popular use by non-motorized recreationists such as wilderness areas and designated non-motorized areas. Although it would be difficult to prevent snowmobilers from riding off-trail, improved trail development, increased signing activities and awareness programs would serve to minimize impacts to non-motorized recreationists.

The Department has determined that recreational impacts resulting from the Snowmobile Grant Program under Alternative 3 would be negligible in the short and long terms.

LAND USE

SUMMARY

Impacts to land use would be limited under all alternatives. Minor land use changes would occur upon construction of new trails. Development of new trails in previously undisturbed areas would constitute a change from natural-undisturbed to developed land use.

Alternative 1

Continuation of the Snowmobile Grant Program as it is currently administered would result in limited impacts to land use (*issues 8, 9 & 10)*. Impacts to land use associated with the Program would be limited to proposals which include the development of new trails in previously undisturbed areas of forest or rangeland. Impacts to land use along newly developed trails would include changes in usage of the trail corridor from natural-undisturbed to developed trail. Direct impacts to land use along existing trails/roads and in local communities would not occur under Alternative 1.

The Department has determined that land use impacts resulting from the Snowmobile Grant Program under Alternative 1 would be negligible in the short and long terms.

Alternative 2

If the Snowmobile Grant Program were to be discontinued, land use in and around recreation based winter communities could change. Although snowmobiling would continue under this alternative, it would occur on a more dispersed basis, having little or no groomed trails to utilize. As patterns of use changed, some trails that were previously maintained for grooming could see limited use and therefore, over time, revert to a semi-natural state. In other instances, areas not included in the trail maintenance schedule under Alternative 1, could be utilized more heavily by snowmobilers and even privately funded groomers. Such increased activity could result in trails being established in areas previously undisturbed. Changes would be more impactive in areas not managed by land management agencies--where development of new trails would still require environmental reviews and documentation.

The Department has determined that land use impacts resulting from the Snowmobile Grant Program under Alternative 2 would be minor in the short and long terms.

Alternative 3

Impacts to land use associated with a modified program would be similar in nature to those identified under Alternative 1. However, any impacts that could potentially occur under this alternative would be addressed in the Department's environmental review document prepared for each project. This review would identify any unique significant land use changes and allow for development of mitigations or alternatives to the proposal.

The Department has determined that land use impacts resulting from the Snowmobile Grant Program under Alternative 3 would be negligible in the short and long terms.

COMPARISON OF ALTERNATIVES

Table 4-2
Impact Comparison by Alternative
Montana Snowmobile Grant Program

ISSUE--IMPACT TOPIC	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3
Administrative (page 68)			
Impacts to Department's legal and fiscal administrative process	Minor to moderate over the short and long terms.	Minor to moderate over the short and long terms.	Minor in the short and long terms.
Impacts to coordination efforts between the Department and other agencies.	Minor in the short term and moderate in the long term.	Moderate over the short and long terms.	Negligible to minor over the short and long terms.
Air Quality (page 71)			
Impacts to air quality in and around recreation based winter communities.	Moderate over the short term and negligible over the long term.	Moderate over the short term and minor over the long term.	Minor over the short term and negligible over the long term.
Impacts to air quality along and adjacent to snowmobile trails.	Minor over the short term and negligible over the long term.	Minor over the short term and negligible over the long term.	Negligible over the short and long terms.
Topography (page 74)			
Impacts to topography from operation and maintenance projects.	Negligible over the short and long terms.	Negligible over the short and long terms.	Negligible over short and long terms.
Impacts to topography from trail and facility development and expansion projects.	Minor over the short and long terms	Negligible over the short and long terms.	Negligible over the short and long terms.
Soils (page 76)			
Impacts to soil erosion and productivity from snowmobiling activities.	Minor over the short and long terms.	Minor over the short and long terms.	Negligible to Minor over the short and long terms.
Impacts to soil erosion and productivity from snow compaction	Negligible to minor over the short and long terms.	Negligible to minor in the short and long terms	Negligible in the short and long terms.

Table 4-2 (cont.)
Impact Comparison by Alternative
Montana Snowmobile Grant Program

ISSUE--IMPACT TOPIC	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3
Roads and Trails on Public Lands. (page 78)			
Impacts to physical integrity of multiple use roads and trails from snow compaction.	Minor to moderate over the short and long terms.	Minor over the short and long terms.	Minor over the short and long terms.
Hydrology (page 79)			
Impacts to stream channels from snowmobile activity	Minor over the short and long terms.	Minor over the short and long terms.	Negligible to minor over the short/long terms.
Impacts to watersheds from snowmobiling activities.	Minor over the short and long terms.	Minor over the short and long terms.	Negligible to minor over the short/long terms.
Impacts to snow and runoff--water management from snowmobiling activities.	Minor over the short and long terms.	Minor over the short and long terms.	Minor over the short and long terms.
Wildlife (page 82)			
Impacts to ungulate habitat, behavior and population distributions.	Moderate in the short term and major in the long term.	Major in both the short and long terms.	Minor in both the short and long terms.
Impacts to Grizzly bear habitat, behavior and population distributions.	Minor to major in the short and long terms.	Moderate to major in the short and long terms.	Minor in both the short and long terms.
Impacts to other wildlife habitat, behavior and population distributions.	Minor in both the short and long terms.	Minor to moderate in the short and long terms.	Minor in both the short and long terms.
Vegetation (page 87)			
Impact to vegetation on trails traversing existing prepared roadbeds	Negligible to minor over the short and long terms.	Negligible to minor over the short and long terms.	Negligible over the short and long terms.
Impact to vegetation and habitat on trails traversing areas with vegetative cover.	Minor to moderate over the short and long terms.	Minor to moderate over the short and long terms.	Negligible to minor over the short/long terms
Socioeconomics (page 90)			
Economic Impacts (negative)	Negligible in the short and long terms.	Moderate to major over short and long terms.	Negligible to minor in the short and long terms.

Table 4-2 (cont.)
Impact Comparison by Alternative
Montana Snowmobile Grant Program

ISSUE--IMPACT TOPIC	ALTERNATIVE 1	ALTERNATIVE 2	ALTERNATIVE 3
Socioeconomic (cont)			
Social Impacts	Minor to moderate in the short and long terms.	Moderate in the short and long terms.	Negligible in the short and long terms.
Cultural (page 93)			
Impacts to prehistoric and historic resource on existing motorized trails/roads from snowmobile activity.	Negligible in the short and long terms.	None	Negligible in the short and long terms.
Impacts to prehistoric and historic resources on historic motorized trails or roads from snowmobile activity.	Negligible to minor over the short and long terms.	Minor over the short and long terms.	Negligible to minor over the short and long terms.
Impacts to archaeological sites along new snowmobile trails and reroutes.	Minor to moderate over the short and long terms.	Minor to moderate in the short and long terms.	Negligible to minor in the short and long terms.
Aesthetics (page 96)			
Impacts on visual resources.	Minor over the short and long terms.	Minor to moderate in the short and long terms.	Negligible to minor over the short and long terms.
Impacts of snowmobile noise levels.	Minor over the short and long terms.	Moderate in the short and long terms.	Minor in the short term/negligible in the long term.
Recreation (page 101)	Minor in the short and long terms.	Moderate in the short and long terms.	Negligible in the short and long terms.
Land Use (page 103)	Negligible in the short and long terms.	Minor in the short and long terms.	Negligible in the short and long terms.

CUMULATIVE IMPACTS

Recreation

Winter--Impacts to soils, vegetation, hydrology, aesthetics and cultural resources, as discussed earlier in this chapter, could be compounded by utilization of snowmobile trails by off-highway vehicles (OHVs) and other four-wheeled vehicles. Cumulative impacts associated with other winter recreational opportunities is addressed in Recreation, Socio-economic, and Aesthetic sections in Chapters 2 and 4.

Summer--Impacts to soils, vegetation, hydrology, aesthetics and cultural resources, as discussed earlier in this chapter, could be compounded by utilization of snowmobile trails in the spring by hikers, cyclers, horseback riders, and off-road vehicles. Cumulative effects attributable to the snowmobile program would be limited to newly constructed trails whose past, present and future uses would be snowmobile-related.

Industrial/Agricultural

Logging/mining--Impacts to soils, vegetation, hydrology, aesthetic and cultural resources could be compounded in the spring if snowmobile trails were to be utilized by logging or mining equipment prior to the trails being sufficiently dried. The compaction of snow, as discussed in the Soils and Hydrology sections of this chapter, could cause trails to retain moisture longer into the spring, thereby making them more susceptible to degradation by wheeled vehicle traffic.

Logging or mining operations in the winter could compound safety problems on snowmobile trails if equipment was to utilize or cross trails without adequate warning precautions.

Ranching/farming--Impacts to soils, vegetation, hydrology, aesthetics and cultural resources, as identified in their respective discussions, could be compounded if cattle were released for grazing in areas where trails have snow or are experiencing runoff. The delay in snowmelt and subsequent runoff can result in an increased level of erosive activity which could ultimately impact stream channels, vegetation and soil stability, and aesthetic quality of an area.

Commercial

Snow tours--Large, commercially sponsored tour groups could combine with existing traffic levels on trails to increase safety as well as aesthetic impacts. However, sponsored tours typically consist of either many individual snowmobiles or a few larger touring machines. Both tour scenarios increase the opportunity for accidents by creating more congestion in areas utilized by other snowmobilers. The wide configuration of touring machines could make it difficult for oncoming snowmobiles to maneuver, thereby increasing the potential for accidents.

Tours consisting of many individual machines could create situations in which snowmobiles operating in the opposite direction or those attempting to pass the slower touring machines would be unable to maneuver in a safe manner because of trail configuration or oncoming traffic. In such instances, safety for snowmobilers could be jeopardized.

Aesthetic impacts, as discussed in their respective sections in this chapter, could be compounded by the increased number of individual machines and size of the larger touring machines.

INDIRECT IMPACTS

Indirect impacts associated with, but outside the jurisdiction of, the Snowmobile Grant Program are similar in nature to the direct impacts discussed in previous sections. With no direct regulation under the Grant Program, indirect impacts could occur in isolated instances with individual resources being impacted more so than similar resources along funded trails.

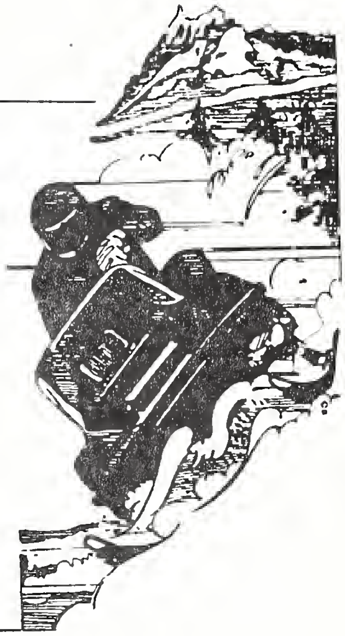
Although activities beyond the funded trail boundary are not within the jurisdiction of the Department's Grant Program, land management agency mandatory NEPA and/or MEPA compliance procedures will consider direct and indirect impacts to local resources on a project-by-project basis.

IRRIVERSIBLE AND IRRETRIEVABLE COMMITTMENT OF RESOURCES

An irriversible or irretrievable commitment of resources would occur if resources were either consumed, committed, or lost as a result of the Snowmobile Grant Program.

The commitment of resources would be "irreversible" if the program resulted in a process (chemical, biological, and/or physical) that could not be stopped. As a result, the resource, or its productivity, and/or its utility would be consumed, committed, or lost forever. The Snowmobile Grant Program would result in no irreversible commitment of resources.

The commitment of resources would be "irretrievable" if the program directly eliminated the resources, its productivity, and/or its utility for the life of the program. The Program would only result in an irretrievable committment of resources in instances where trail development required the removal of vegetation, trees in particular, and/or any cut and fill activity.



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CONSULTATION AND COORDINATION

A formal period for receiving public comments regarding the scope of the PEIS was included with the announcement of eight public scoping meetings to be held across Montana. Notification of the public meetings was published in eight local and area newspapers and announced over a number of local radio stations. The Department prepared 500 scoping brochures which explained the Snowmobile Grant Program, the PEIS process, identified the dates and locations of the eight scoping meetings and provided a sheet for public comments to be sent to the Trail Program Coordinator. 107 comment letters on the scope of the PEIS were received by the Department.

Public meetings were held in the following locations between August 17 and 27, 1992: Bozeman; Great Falls; Billings; West Yellowstone; Missoula; Kalispell; Seeley Lake; and Helena. Attendance at the eight public meetings totaled 191, ranging from sixty-three in Missoula to seven in Great Falls.

CONSULTATION AND COORDINATION

In the process of preparing this programmatic EIS, the Department consulted or coordinated with a variety of state and federal agencies.

- Montana Department of Fish, Wildlife and Parks (Wildlife Division) was contacted to provide consultation on wildlife matters.
- Montana Department of State Lands was contacted regarding regulations involving snowmobile program/department interactions, access, right-of-way easements, permits and review processes.
- Montana Department of Health and Environmental Sciences was contacted regarding air quality.
- Montana Department of Highways was contacted to provide information on highway right-of-ways, plowing, snowmobile violations and speed limits.

- U.S. Department of the Interior, Bureau of Land management (BLM) was contacted about right-of-way easements, snowmobile trail permits, access, review processes and project proposals.
- U.S. Department of Agriculture, Forest Service was contacted to provide consultation on wildlife matters, environmental reviews, special use permits, access violations, permit review procedures and cooperative agreements.

REVIEW

This PEIS or a summary has been mailed to all parties who have expressed an interest in receiving it. Additional copies of the document are available for review upon request from the Helena office or any regional office of the Montana Department of Fish, Wildlife and Parks as identified below:

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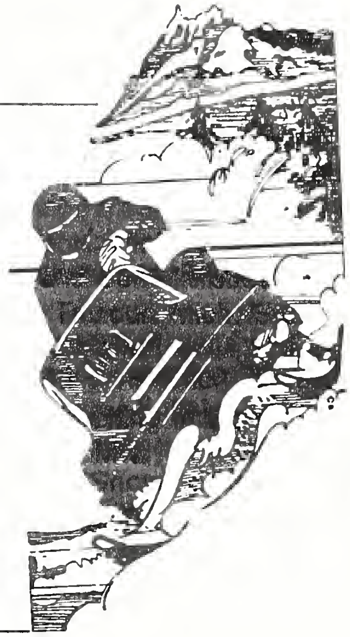

7

GLOSSARY

Agency's Preferred Alternative - the alternative which the agency believes would fulfill its statutory mission and responsibilities, giving consideration to economic, environmental, technical and other factors.

Alluvial Fan - A fan-shaped deposit of sediment built by a stream where it emerges from an upland or a mountain range into a broad valley or plain.

Ambient - Surrounding on all sides.

Chinook - A warm, dry wind that descends the eastern slopes of the Rocky Mountains.

Conifer - Any of an order of mostly evergreen trees and shrubs, including forms with true cones and others with an arillate fruit.

Cut and Fill - The process of removing soil from one area and placing it elsewhere to form a base for any given activity (i.e. highway, trail, structural footings, etc.).

Deciduous Vegetation - Vegetation that sheds its leaves seasonally or at a certain stage in the life cycle.

Demographics - Of or relating to the dynamic balance of a population with regard to density and capacity for expansion or decline.

Dispersion - The action of mixing air, containing a high concentration of pollutants arising from a pollutant source, with the ambient air, thereby, reducing the ambient pollutant concentration.

Ecology - The science of relationships between living things and their environments.

Endangered Species - Any plant or animal species which is in danger of extinction throughout all or a significant portion of its range (Endangered Species Act of 1973).

Ephemeral - A temporary or short-lived condition. Characteristic of some streams that change rapidly, especially after heavy rains.

Erosion - The breakdown and transportation of earth materials at the surface. Agents of erosion include water, wind, ice, and gravity.

Evapotranspiration - Loss of water from the soil, both by evaporation and by transpiration from the plants growing thereon.

Floodplain - The flat, occasionally flooded area bordering streams, rivers or other bodies of water susceptible to changes in the surface level of the water.

Groomer - Any of a number of devices used to create a uniform/stable snow surface. Commonly used on snowmobile and ski trails.

Habitat - A type of place that supports an animal or a population because it supplies the animal's basic requirements: food, water, shelter, living space, and some level of security.

Harassment - The persistent annoyance of wildlife from individuals on foot or on machines.

Hydrology - The properties, distribution and circulation of water on the surface of the land, in the soil and underlying rocks, and in the atmosphere.

Inversion - A meteorological condition in which the temperature of the atmosphere rises with increased elevation instead of falling; a negative temperature lapse rate.

Mass Wasting - The transfer of rock and soil downslope by direct action of gravity without a flowing medium (such as a river, or glacial ice).

Mitigation - An action causing an impact or affect to become less harsh or hostile.

Noxious Weeds - Any exotic plant species established, or that may be introduced in the state, which may render land unfit for agriculture, forestry, livestock, wildlife, and other beneficial uses, or that may harm native plant communities.

Perennial - Persisting for several years.

Prehistoric - Those sites which are known to have been used or occupied before written records were kept of an area.

Riparian - Pertaining to or located along a streambank or other water bodies, such as ponds, lakes, reservoirs, or marshes.

Runoff - Water that flows over the land surface.

Scoping - The procedures by which the Department determines the extent of analysis necessary for a proposed action.

Significant - As used in NEPA, requires consideration of both context and intensity. Context means that the significance of an action must be analyzed in several contexts such as society as a whole, and the affected region, interests and locality. Intensity refers to the severity of impacts. (40 CFR 1508.27).

Soil - The surface material of the continents, produced by disintegration of rock.

Species - A group of interbreeding individuals of common ancestry that are reproductively isolated from other such groups; a taxonomic unit ranking below a genus and designated by a binomial consisting of its genus and the species name.

Threatened Species- Any species of plant or animal which is likely to become endangered within the foreseeable future throughout all or a significant portion of its range.

Tier - To draw and share information from another document.

Topography - The shape and form of the earth's surface.

Traditional - Often referred to as Sacred Sites, are localities known, through historic records and oral traditions, to have been used or are currently being used for purposes of worship (prayer, fasting, vision-questing, etc.).

Ungulate - Hoofed mammals. (i.e. elk, deer, antelope, etc.)

Watershed - A region or area bounded peripherally by a water parting formation (i.e. ridge, hill, mountain range) and draining ultimately to a particular watercourse or body of water.

Wetland - The transition between terrestrial and aquatic systems, where water is the dominant factor determining development of soils and associated biological communities and where, at least periodically, the water table is at or near the surface, or the land is covered by shallow water.

Winter Range - The area, usually at lower elevations, used by ungulates during the winter months.

Environmental Review Criteria
Montana Department of Fish, Wildlife and Parks
Snowmobile Grant Program

Proposals for grants allocated under the Montana Snowmobile Grant Program shall be reviewed in accordance with the following Environmental Review Criteria. In some cases, proposed projects may be determined by the Department to be categorically excluded from the environmental review process. If a project satisfies number 1 below, the project qualifies for a categorical exclusion.

1. Continuation of an existing program with no on-ground changes and that has previously satisfied MEPA reviews.

Projects that do not satisfy number 1, but do satisfy numbers 2 through 7, qualify for a categorical exclusion.

2. Snowmobile trail on federal lands is already incorporated in U.S. Forest Service or Bureau of Land Management travel plan and Multi-Party Agreement has been signed.

3. Fish, Wildlife and Parks wildlife clearance has been obtained.

4. Snowmobile Project Agreeement has been signed by sponsor and Department.

5. Project is on an existing roadway or previously ungroomed snowmobile trail.

6. Development or improvements on federal lands have already satisfied NEPA, on state lands have already satisfied MEPA, or development and improvements are upgrades or repairs of existing facilities or structures which do not require any on-ground changes.

7. Trail is not in a wilderness study area or designated non-motorized area.

If the proposed project does not meet the requirements necessary for a categorical exclusion it must be reviewed in accordance with the Environmental Review Criteria identified below:

When reviewing projects within the checklist that result in a request for additional information, three subsequent requests for the same information will result in a denial of the project, or that portion of the project if it is a stand alone component.

Prior to making a final determination that a new or substantially changed application satisfies the criteria for a categorical exclusion, the Department will provide fifteen calendar days for public review and comment.

Environmental Review Criteria–Montana Snowmobile Grant Program

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N *(Circle 1)*	REQUIRED ACTION
Issue 1 Administration	Map identifying proposed trails and facilities	1	Does map clearly identify proposed activities (i.e. trails, parking lots, etc.)?	Y	Go to #2
				N	Request Submittal
	Decision memo and env. document from land mgmnt agency	2	Do any proposed activities occur on lands managed by another agency?	Y	Go to #2a
				N	Go to #3
		2a	Did the land mgmnt agency Prepare an env. document?	Y	Go to #2b
				N	Go to #3
		2b	Was the decision memo supplied w/ application?	Y	Go to #4
				N	Request submittal
	Internal environmental review document.	3	Does the proposal include operation and maintenance projects?	Y	Go to #3b
				N	Go to #3a
		3a	Does the proposal include expansion or construction of trails or facilities?	Y	Go to #3b
				N	Go to #4
		3d	Has checklist EA been prepared?	Y	Go to #3h
				N	Request submittal
		3c	Does the checklist EA satisfy MEPA/NEPA?	Y	Go to #3h
				N	Go to #3d
		3d	Has an EA been prepared?	Y	Go to #3h
				N	Request EA
		3e	Did the EA satisfy MEPA/NEPA?	Y	Go to #3h
				N	Go to #3f
		3f	Has an EIS been prepared?	Y	Go to #3g
				N	Request EIS
		3e	Did EIS satisfy MEPA/NEPA?	Y	Go to #3[illegible]
				N	Reject Proposal
		3d	Did applicant supply decision notice?	Y	Go to #4
				N	Request submittal
	Licenses, leases, permits, clearances, etc.	4	Has applicant supplied appropriate copies required by other agencies?	Y	Go to #6
				N	Request submittal
Issue 2 Air Quality	Map identifying proposed trails and facilities	6	Does map clearly identify proposed activities?	Y	Go to #6a
				N	Request submittal

Environmental Review Criteria--Montana Snowmobile Grant Program (page 2)

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N *(Circle 1)*	REQUIRED ACTION
Air Quality (cont.)		6a	Does proposal include expansion of existing or construction of new trails?	Y	Go to #6b
				N	Go to 7
	Connection to other trails or trail systems.	6b	Does the expanded or new trail connect with another trail system or trail?	Y	Go to #7
				N	Go to #7
	Public awareness plan.	7	Has applicant submitted a public awareness plan?	Y	Go to #9
				N	Request submittal
Issue 3 Topography, Soils, Hydrology	Map identifying proposed trail or facilities.	9	Does map clearly identify proposed activities?	Y	Go to #9a
				N	request submittal
		9a	Are there areas of known insufficient snowcover along proposed trails.	Y	Go to #9b
				N	Go to 9c
		9b	Are areas of known insufficient snowcover identified on the maps?	Y	Go to #9c
				N	Request submittal
		9c	Are there areas characterized by summer wet meadows?	Y	Go to #9d
				N	Go to #10
		9d	Are areas of known wet meadows identified on the map?	Y	Go to #9e
				N	Request submittal
		9e	Have viable alternatives around areas of known insufficient snow-cover or summer wet meadows, been identified?	Y	stipulate--go to #10
				N	request submittal
	Avoidance.	10	Has applicant submitted a plan for avoidance of areas of known insufficient sno-cover or summer wet meadows?	Y	Go to #10a
				N	Request Plan
		10a	Does the plan identify specific measures for each area identified on the map?	Y	Go to #11
				N	Request specifics
	Seasonal Restrictions	11	Does the proposal include stream crossings?	Y	Go to #11a
				N	Go to #12
		11a	Does the proposed stream crossing utilize an existing structure?	Y	Go to #12
				N	Go to #11b

Environmental Review Criteria--Montana Snowmobile Grant Program (page 3)

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N *(Circle 1)*	REQUIRED ACTION
Topography (cont.)		11b	Are there viable alternatives to crossing the stream that would utilize existing structures?	Y	Stipulate--go to #12
				N	Go to #11c
		11c	Is construction of temporary crossing structures viable in the proposed crossing location?	Y	Stipulate--go to #12
				N	Reject
	Public awareness plan	12	Has applicant submitted a public awareness plan?	Y	Go to #13f
				N	Request submittal
Issue 4 Wildlife	Map identifying proposed activities.	13	Does map clearly identify proposed activities?	Y	Go to #13a
				N	Request submittal
		13a	Are there known ungulate wintering areas in the vicinity of proposed trails?	Y	Go to #13b
				N	Go to #14
		13b	Are there ungulate wintering areas identified on the map?	Y	Go to #13g
				N	Request submittal
		13c	Do proposed trails remain on the periphery of winter ranges?	Y	Go to #13f
				N	Go to #14
		13d	Does proposed trail pass through wintering areas?	Y	Go to #13f
				N	Go to #13h
		13e	Is there a viable alternate route available for use?	Y	Go to #13f
				N	Reject
	Avoidance	13f	Is the trail length along the periphery of the wintering area the least possible?	Y	Go to #13g
				N	Revise plan
		13g	Was vegetative screening used whenever possible?	Y	Go to #13h
				N	Revise to utilize veg screen
		13h	Has signing plan been proposed to keep snowmobilers from disturbing wintering ungulates?	Y	Go to #14
				N	Request
	Seasonal Restrictions	14	Are there ungulate wintering areas in grizzly bear habitat?	Y	Go to #14a
				N	Go to #15
		14a	Are there proposed trails near these areas?	Y	Go to #14b
				N	Go to #15

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N (Circle 1)	REQUIRED ACTION
Wildlife (cont.)		14b	Have seasonal restrictions in these areas been identified.	Y	Go to #14c
				N	Stipulate--go to 14c
		14c	Has a signing plan been proposed to mark restricted areas?	Y	Go to #15
				N	Stipulate--go to 15
	Idle zones	15	Are there known bald eagle nests or grizzly hibernation areas.	Y	Go to #15a
				N	Go to #17
		15a	Are trails proposed near any of these sites?	Y	Go to #15b
				N	Go to #17
		15b	Are viable alternatives identified that avoid these areas?	Y	Stipulate--go to 17
				N	Go to #15c
		15c	Have idle zones been proposed for these areas?	Y	Go to #16
				N	Stipulate--go to 16
	Signing	16	Have signing strategies been proposed to identify idle zones?	Y	Go to #17
				N	Stipulate--go to 17
	Public awareness plan.	17	Has a public awareness plan been established	Y	Go to #18
				N	Stipulate--go to 18
	Clearance oversight.	18	Did applicant supply info. and wildlife clearance with application?	Y	Go to #19
				N	Request
Issue 5 Vegetation	Maps identifying proposed trails and facilities.	19	Does map clearly identify proposed activities?	Y	Go to #19a
				N	Request
		19a	Is the proposed trail/ facility located entirely on an existing road or trail?	Y	Go to #20
				N	Go to #19b
		19b	Have existing roads been used whenever possible?	Y	Go to #19c
				N	Stipulate--go to 19c
		19c	Does all or a portion of trails occur on a vegetated road or trail?	Y	Go to #19e
				N	Go to #19e
		19d	Does all or a portion of proposed activity occur on undeveloped land?	Y	Go to #19e
				N	Go to #20
		19e	Has the Natural Heritage vegetation list for the proposed region been submitted (NRIS-State Lib)?	Y	Go to #19f
				N	Stipulate--go to 19f

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N *(Circle 1)*	REQUIRED ACTION
Vegetation (cont.)		19f	Does the Natural Heritage list identify any rare or endangered plant species in the area of proposal?	Y	Go to #19g
				N	Go to #20
		19g	Are any species on the list common in alpine tundra?	Y	Go to #19h
				N	Go to #19j
		19h	Do any proposed trails that are not on existing roads cross alpine tundra?	Y	Go to #19i
				N	Go to #19j
		19i	Are there alternative to crossing the alpine tundra?	Y	Go to #19j
				N	Reject
		19j	Do any proposed activities involve areas of insufficient snowcover or summer wet meadows?	Y	Go to #19k
				N	Go to #20
		19k	Are there viable alternatives to avoid areas of insufficient snowcover or summer wet meadows	Y	Stipulate--Go to #20
				N	Go to #19L
		19L	Has applicant submitted an avoidance or seasonal restriction plan for areas of insufficient snowcover or summer wet meadows?	Y	Go to #20
				N	Request--go to 20
	Monitoring for noxious weeds.	20	Are noxious weeds present within the trail area, particularly in staging areas?	Y	Go to #20a
				N	Go to #21
		20a	Has noxious weed plan been proposed in app.?	Y	Go to #20b
				N	Stipulate--go to 20b
		20b	Has a monitoring plan been proposed to survey vegetation damage and spread of noxious weeds?	Y	Go to #21
				N	Stipulate--go to #21
	Public awareness	21	Has a public awareness strategy been proposed	Y	Go to #22
				N	Stipulate--go to 22
Issue 6 Socioeconomics	Planning	22	Does the application include organized events or promotional activities that would utilize funded trails?	Y	Go to #22a
				N	Go to #23
		22a	Does application include projected number of trail users generated by the events?	Y	Go to #22b
				N	Request--go to 22b

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N *(Circle 1)*	REQUIRED ACTION
Socioeconomics (cont.)		22b	Does application include a public safety plan for the events?	Y	Go to #22c
				N	Stipulate--go to #22c
		22c	Has applicant identified additional employment requirements during event?	Y	Go to #23
				N	Request--go to #23
Issue 7 Cultural	Map identifying proposed trails and facilities.	23	Has map identifying proposed trails or facilities been submitted?	Y	Go to #23a
				N	Request--to to #23a
		23a	Is entire proposed trail/ facility located within a existing road or trail?	Y	Go to #24
				N	Go to #23b
		23b	Does all or a portion of the proposed trail/facility occur on a historic road or trail?	Y	Go to #23d
				N	Go to #23c
		23c	Does all or a portion of the proposed trail/facility occur on undeveloped land?	Y	Go to #23d
				N	Go to #24
		23d	Do viable alternative routes exist that could utilize existing roads or trails?	Y	Stipulate--go to #24
				N	Go to #23e
	Site specific treatment	23e	Was SHPO consulted for determination of need for cultural resource investigation?	Y	Go to #23f
				N	Stipulate--go to #23f
		23f	Was a cultural resource investigation conducted?	Y	Go to #23g
				N	Inquire as to why
		23g	Were significant sites found?	Y	Go to #23h
				N	Go to #24
		23h	Were adequate mitigations applied (i.e. reroute,etc.)?	Y	Go to #23i
				N	Stipulate--go to 23i
	Public awareness plan.	23i	Is a public awareness strategy proposed?	Y	Go to #24
				N	Stipulate--go to #24
Issue 8 Safety/Private Property	Maps identifying proposed trails and facilities.	24	Does map clearly identify proposed activities?	Y	Go to #24a
				N	Request--go to 24a
		24a	Does application include proposal for signing strategy identifying locations for warning signs.	Y	Go to #24b
				N	Stipulate--go to #24b

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N *(Circle 1)*	REQUIRED ACTION
Safety/PP (cont.)		24b	Have private properties along proposed trails been identified?	Y	Go to #24c
				N	Request--go to #24c
	Avoidance	24c	Do viable alternatives exist that avoid private property?	Y	Stipulate--go to #25
				N	Go to #24d
	Signing and public awareness	24d	Has applicant included a strategy for signing and public awareness re: private property?	Y	Go to #25
				N	Stipulate--Go to #25
Issue 9 Wilderness Areas	Map identifying proposed trails and facilities.	25	Do maps identify proposed trail locations?	Y	Go to #25a
				N	Request--go to #25a
		25a	Are proposed trails located near wilderness boundary or designated non- motorized recreation area?	Y	Go to #25b
				N	Go to #25b
	Trail location strategies	25b	Is there heavy vegetative cover or topographic features between proposed trail and wilderness boundary/designated non-motorized area?	Y	Go to #25e
				N	Go to #25c
		25c	Do viable alternatives exist that would utilize vegetative screening between wilderness boundary or designated non-motorized area?.	Y	Stipulate--go to #25e
				N	Go to #25d
		25d	Do viable alternatives exist that would situate topographic features between proposed trail and wilderness area or designated non-motorized area?	Y	Stipulate--go to 25e
				N	Go to #25e
		25e	Does proposal include trails on or adjacent to established cc ski trails?	Y	Go to #25f
				N	Go to #26
		25f	Are there viable alts. that would avoid placement of proposed trails on or adjacent to cc ski trails?	Y	Stipulate--go to #26
				N	Go to #26
	Signing	26	Has signing program been established that would warn snowmobilers of shared use areas, wilderness boundaries, intersections, etc?	Y	Go to #27
				N	Stipulate--go to #27

DISCIPLINE	APPLICATION REQUIREMENTS		REVIEW CRITERIA	Y/N (Circle 1)	REQUIRED ACTION
	Speed limits	27	Does proposed trail go through residential areas or areas of particular sensitivity?	Y	Go to #27a
				N	Go to #28
		27a	Has applicant established appropriate speed limits or hourly restrictions in areas of sensitivity?	Y	Go to #28
				N	Stipulate--go to #28
		28	Has applicant proposed public awareness plan that includes consideration for residential and sensitive areas?	Y	Go to #29
				N	Stipulate--Go to #29
Issue 8 Law Enforcement		29	Has applicant provided law enforcement report from DFW&P Region Warden Captain and/or land managing agency identifying documented snowmobile trespass on private lands and/or wilderness areas caused by adjoining or nearby funded trail and proposal for addressing such violations?	Y	Go to #30
				N	Stipulate--go to #30
Issue 10 Changes in aesthetic values	Litter remediation	30	Has applicant included a trash receptical location, placement and management strategy?	Y	Go to #30a
				N	Stipulate--go to #30a
		30a	Has applicant proposed "pack-it-in pack-it-out" type signing strategy?	Y	Go to #30b
				N	Stipulate--go to #30b
	Trail location strategies	30b	Has applicant satisfied questions 25 - 29?	Y	Go to #31
				N	Go to #25
		31	Have all appropriate boxes in right-hand column been checked?	Y	Env. considerations approved
				N	Take appropriate actions until all boxes are checked.

APPENDIX B

CURRENT PROGRAM APPLICATION, MULTI-PARTY AGREEMENT, SNOWMOBILE PROJECT AGREEMENT & WILDLIFE CLEARANCE FORM

SNOWMOBILE TRAIL PROJECT PROPOSAL/APPLICATION

Fiscal Year 1994 (7/1/93 - 6/30/94)

1. Project Sponsor: Snowmobile club/organization applying for funds. Print Legibly or type mailing address for sponsor. This is the address to which program funds and correspondence will be mailed.

____
____
____
____

Number of members in club _______________

2. Map of Project Area. A trail map must be included with this application identifying trails to be groomed and/or developed.

3. Estimated Total Project Cost: The total project cost (A) is the sum of the dollar value of (B) sponsor contributions such as value of volunteer time, sponsor funds, donated materials, etc. plus (C) those funds requested from the state snowmobile fund.

	A. Total Costs	B. Sponsor Contribution	C. Requested $ From State Fund
Grooming			
Repair			
Plowing			
Development*			
Administrative			
Total			

* Development: On separate paper, provide written detail of any development included in this application including work to be accomplished, estimated cost, an accurate drawing or photograph of structures to be developed and location of development on accompanying trail map. This development must be approved by the landowner or land managing agency and proof of that approval must be provided to Fish, Wildlife, and Parks before state snowmobile funds will be provided.

4. Is this a new project__________? Is any part of this trail system new since last year________? If so, identify those new portions on accompanying map and be certain to include signed Wildlife Clearance forms with application.

5A. Total number of miles of trail in your groomed system ______

Miles of Primary Trail (groomed regularly) ____________

Miles of Secondary Trail (groomed occasionally or only for special events.) _______________

5B. Anticipated total number of miles of trail to be groomed during season. Only include actual trail miles groomed. Do not include distance (miles) groomer is run (but not grooming) in getting from one trailhead to another. _______________

5C. Miles of groomed snowmobile trail by ownership: (this should add-up to the total miles reported in (5A).

U.S. Forest Service ________
Bureau of Land Management ________
Dept. of State Lands ________
County ________
City ________
Private Land ________

6. Equipment. Identify below the manner in which trails will be groomed and maintained:

6A. With Department of Fish, Wildlife and Parks equipment.

Groomer:

Type	Size	Width	Serial #	FWP Property #

Implements:

Type	Size	Width	Serial #	FWP Property #

Trailers:

Type	Size	Width	Serial #	FWP Property #

6B. With Sponsor (club) equipment).

6C. By an independent contractor operating their own equipment. Attach a copy of proof of liability insurance, Workers Compensation Certification and club-contractor agreement.

Contractor	Equipment Type	Size	Width

6D. Indicate any additional or future equipment needs and/or anticipated major maintenance needs.

7. Trail Signing. Identify signing needs for the upcoming season. (use additional sheet if necessary)

Type of Sign	Quantity

8. If applicable, is this proposal consistent with approved Forest Service travel plans or BLM unit plans?

____________ Not applicable; all trails on private land.
____________ Yes. See written approval.
____________ No. Approval Pending. Explain on separate page.

9. Total number of trail users (last season). List by trail.

Trail name	Total # of Users

Attach copy of trail count or other records. Use separate sheet if necessary.

10. Describe the extent of Safety and Education Program:

11. Describe any future plans your club has, or is considering, for improvement of your snowmobile trail program. This might include interlinking your system with an adjoining club's trail system, interpretive signing, improved general trail signing, trail-head facilities, safety training and trail safety improvements/changes, etc.

12. Club Officers. (Type or print legibly.)

President

Name____________________________
Address____________________________
____

Phone (w)__________(h)__________

Grooming Chair

Name____________________________
Address____________________________
____

Phone (w)__________(h)__________

Safety Officer

Name____________________________
Address____________________________
____

Phone (w)__________(h)__________

Secretary/Treasurer

Name____________________________
Address____________________________
____

Phone (w)__________(h)__________

13. Do you wish to receive a pre-season check in the amount of 75% of the total grant approved (this will be contingent on the reception of all necessary approvals, agreements and application materials)? Yes________ No ________

14. Do you wish to be included under the liability insurance policy for the snowmobile program negotiated by the Department of Fish, Wildlife and Parks? Yes ________ No ________

A. If club (sponsor) does grooming with a state groomer, do you want full coverage from state policy (includes club liability, and property damage)?

Yes __________ No __________

B. If club contracts grooming to a private contractor, do you still want club liability insurance from the state policy? *

Yes __________ No __________

* The state insurance coverage is not available to private contractors. They must show proof of having purchased their own insurance coverage and workman's compensation.

Clubs/sponsors must also provide proof of insurance coverage if they do not purchase insurance from the state policy.

15. Assurances:

We shall remove, lessen or sign known and potential hazards in cooperation with Montana Fish, Wildlife and Parks and affected landowners. We will have a safety plan detailing education efforts, search and rescue, accident reporting and follow-up procedures developed prior to any trail grooming.

Before any mid-season trail additions or route changes, we will:

1) Obtain, in writing, permission from any private or public landowner or land management agency affected and provide to Department of Fish, Wildlife and Parks.

2) Receive written approval, including wildlife and safety clearances, for such additions/changes from Department of Fish, Wildlife and Parks.

For any organized special events, including competitive events, fun runs or activities outside of normal trail use, we will:

1) Contact the appropriate land-managing agency(ies) for the necessary permits.

2) Develop an event-specific safety plan.

When applicable, all operations shall follow the "Development and Operating Agreement" between the Montana Department of Fish, Wildlife and Parks; the U.S. Forest Service; the Bureau of Land Management and snowmobile clubs.

Club President/Chair Date

Secretary or Treasurer Date

Guidelines for Completing the Snowmobile Project Proposal/Application

Estimating Project Cost

If the club chooses to account for costs by the mile, calculate cost per mile by dividing total operating costs by the number of miles expected to be groomed. Do not include development costs in grooming cost-per-mile calculations.

Total estimated costs include:

Grooming Costs - All costs incurred to operate the groomer such as fuel, oil, groomer operator wages, and payments for contracted snow grooming.

Repair Costs - All costs associated with repair and maintenance of grooming equipment such as shop rental, parts and labor.

Administrative Costs - All costs associated with the administration of a grooming program such as insurance premiums, utilities, workman's compensation, income tax withholding, telephone costs and secretarial or accounting service expenses.

Development Costs - All costs associated with development of facilities such as materials or labor, fuel and oil for transportation or power tools or heavy equipment use.

Plowing Costs - Costs incurred for plowing parking lots or roads either by contract, through an inter-agency agreement, or as part of regular grooming operations.

Total project costs and total club's contribution are the total of Grooming Cost Column and Development Costs Column.

Establishing Value of Club's Contributions

The club should prepare a list of anticipated activities which will enhance their snowmobile project. These activities should include any that would be allowable as a program expense. For example, trail clearing would be allowable, hosting a trail ride would not be.

Clubs should be encouraged to support their program, through volunteer efforts, donation of money, materials or equipment. List anticipated value of cash donations, man hours of donated labor, equipment used, supplies and materials furnished.

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a. Examples of volunteer labor: trail clearing and marking, equipment maintenance, groomer operator, groomer "co-pilot," etc. Volunteer efforts performing trail inspections and maintaining the signing program are also considered eligible donations. Volunteer wages are estimated at Montana's current minimum wage.

b. Examples of donated equipment: trail groomer, transportation to clear and mark trails, use of personal snowmobile to accompany groomer operator, use of chain saw to clear trails, etc. Vehicles may be credited at $.21 per mile. Use of chainsaws will be credited at $30 per day.

c. Examples of donated supplies and materials: signs, hardware, fuel, oil, parts, etc. Value of donated supplies and materials will be established by soliciting verbal bids and "best-guess" estimate.

d. Cash: club funds used to pay operating costs.

Equipment

Briefly describe existing and desired grooming equipment.

Estimating Number of Miles to be Groomed

Estimate the number of miles of trail that will be groomed during the course of the winter. This figure represents the total miles you expect to put on the grooming equipment during the next season.

Miles of Groomed Trails

This figure represents the total number of miles in the project's trail system.

Signing Needs for Upcoming Season

This represents your signing needs for the next season. Work with the regional park manager and the safety/education officer in Helena in developing your signing needs.

Mapping Needs for the Upcoming Season

Describe here what your mapping needs are. Work with the regional park manager and safety/education officer.

Club Officers

List the current officers. It is mandatory that each club has an appointed Safety Officer

Safety and Education Program

Describe the extent of your safety and education program. This information is weighed heavily during the budget process and is an indication of the club's commitment to the program.

SNOWMOBILE PROJECT AGREEMENT

THIS PROPOSAL requests an agreement be established between the Montana Department of Fish, Wildlife and Parks, an agency of the State of Montana, hereinafter called "Department," and (club name) ________________________________ hereinafter called "the Club."

WITNESSETH:

RECITALS

1. Montana statutes earmark a portion of gasoline taxes and snowmobile registration decal fees for snowmobile facility operation, maintenance and development for public use at no cost to the public.

2. Sufficient funds have accrued in the snowmobile earmarked revenue account to fund this proposal.

3. The Parks Division, Montana Department of Fish, Wildlife and Parks, is responsible for the administration of this program.

4. The Parks Division desires to seek means of funding snowmobile facilities maintenance projects, and to seek baseline information for snowmobile operations projects.

5. The Club is an entity in the immediate vicinity of the trails to be maintained and is desirous of seeing trails maintained for snowmobilers.

6. Both parties hereto desire to maintain trails for snowmobile use on land shown on a map submitted as a supplement to this application, designated Attachment "B", and

7. As demonstrated by the attached written statements, the landowner(s) of affected property(ies) has/have granted permission to the Club to carry out the proposal on affected property.

NOW, THEREFORE, in consideration of the promises, conditions, and terms hereinafter set forth, the Club proposes:

1. That Attachment "B" is an accurate depiction of the areas covered by this proposal.

2. That the Club will perform the following activities and duties:

    A. Utilize dollars granted for the purpose of maintaining snowmobile trails detailed in Attachment "B". This maintenance shall be conducted as conditions required during the agreement period.

B. Permit inspection of the project by the Department or its employees or agents at any and all reasonable times during the term of the agreement.

C. Indemnify and save harmless the State and the Department from all claims from injuries or damages arising or growing out of the operations performed under any resulting agreement.

D. Will not discriminate against any person on the basis of race, color, religion, creed, political ideas, sex, age, or marital status, physical or mental disability, or national origin in the use of any property or facility maintained pursuant to any resulting agreement.

E. Fully comply with all applicable federal, state and local laws, rules, regulations, etc. It shall be the Club's responsibility to familiarize itself with the relevant laws, rules, regulations, etc.

F. Require that in all subcontracts let in fulfilling any resulting agreement, preference must be given to the employment of bona fide Montana residents at the prevailing rate of wages applicable to the county or locality in which the work is being performed (section 18-2-401, et. seq., MCA).

G. Provide the Department with documentation of actual and necessary expenses incurred in trail maintenance in the form and upon the dates requested; all such documentation will be submitted by May 1 of the contract period. The Club agrees to allow and permit legislative or department auditors access to its records for the purpose of determining that this grant is administered in accordance with grant terms and conditions as set forth in any resulting agreement.

4. Agrees that any contract resulting from this proposal shall be with the Club, as an independent contractor and does not establish an employer-employee relationship between the Department and the Club or any person employed by the Club for any purpose. In this regard, the Club agrees:

A. To pay all required state, federal or local taxes, fees, including unemployment insurance and workers' compensation insurance or other assessments related to employment of any person or individual employed by the Club as necessary in fulfillment of this contract.

B. To abide by the State Prevailing Wage Rate - Section 18-2-406 MCA, which provides that contractors, subcontractors and employees who are performing services under public works contracts as provided in Part 4, MCA shall post in a prominent and accessible site on the project or work area, not later than the first day of work, a legible statement of all wages to be paid to the employees on such site or work area.

5. Agrees that the Department may unilaterally terminate any contract resulting from this proposal upon refusal by the Club to allow access to records necessary to carry out the legislative audit and analysis function set forth in Title V, Chapters 12 and 13, MCA.

6. Agrees that venue will be in Lewis and Clark County should any legal action arise from this proposal or any contract issued in whole or in part therefrom.

7. Agrees that it is understood that a failure to comply with any of the provisions listed above can result in a rejection of this proposal and/or the voiding of any resulting contract.

NOW, THEREFORE, in consideration of the promises, conditions, and terms hereinafter set forth, the parties agree as follows:

1. The period covered by this agreement will begin July 1, (current year) and will continue in effect until June 30, (following year) .

2. This agreement may be revised as necessary, by mutual consent of all parties by issuance of a written amendment, signed and dated by all parties.

3. The rights and obligations of any part to this agreement may be terminated upon giving thirty (30) days notice by the party.

4. The agreement accepts the Snowmobile Project Proposal/Application and becomes part of the agreement.

BY: CLUB

____

President Date

____

Secretary Date

BY: DEPARTMENT OF FISH, WILDLIFE & PARKS

____

Regional Supervisor Date

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DEVELOPMENT AND OPERATING AGREEMENT

Between

______________________________ SNOWMOBILE CLUB

and

Montana Department of Fish, Wildlife and Parks

and

__________________________ NATIONAL FOREST - USDA FOREST SERVICE

THIS AGREEMENT, made and entered into by and between the ____________________ Snowmobile Club, a non-profit organization in the State of Montana, ("the Club"), and the Montana Department of Fish, Wildlife and Parks, State of Montana, ("the Department"), and the __________ National Forest, U.S. Department of Agriculture, Forest Service, ("the Forest Service"), collectively, ("the Cooperators") under the provisions of Montana, Code 23, Chapter 2, and the Acts of June 30, 1914 (16 USC 498) and June 12, 1960, (16 USC 530),

WITNESSETH:

RECITALS

1. The Forest Service is responsible for the National Forests' recreation resources and their being available for public use and enjoyment, and

2. Managed and maintained snowmobile trails in the vicinity of ________________________________ on the ____________________ Ranger District, need to be groomed to provide snowmobilers with a safer and more enjoyable recreation experience, and

3. The Club is interested in assisting in the maintenance and operation of snowmobile facilities and activities on the land administered by the Forest Service, for use by Club members as well as the general public, and

4. The Department controls State funds earmarked for the development and maintenance of snowmobile trails and desires to cooperate with the Forest Service and the Club in the development and maintenance of snowmobile facilities on the land administered by the Forest Service, and

5. The general public will benefit from the three parties cooperating in the providing for these recreation facilities.

NOW, THEREFORE, in consideration of the above premises, the parties hereto agree as follows:

A. THE CLUB SHALL:

1. Meet with the Department to develop an annual Project Proposal/Application showing grooming routes, schedules, signing and club officers. Provide copies to the Department, and in turn the Department shall provide copies to the Forest Service by May 1 of each year.

2. Erect at the trailhead certain signs as needed and store these signs in the off season. Necessary signs will be detailed in the annual Project Proposal/Application. Signs approved by the Department shall be purchased by the Department and installed by the Club.

3. Provide and erect at strategic points along the snowmobile trails, certain signs showing trail locations, and length; and shall erect at the parking area or trailhead a sign which states that the project is funded by state gasoline tax refunds and snowmobile registration decal fees and lists the cooperators. Signs approved by the Department will be purchased by the Department and installed by the Club.

4. Perform such trail maintenance and marking as may be necessary to keep the trails safe and usable.

5. Provide trail grooming once a week, more or less, depending upon the suitability of snow conditions for snowmobiling and availability of funds in their snowmobile trail grooming budget.

6. Bill the Department at the end of each grooming month for costs of grooming. The Club may request an advance of funds by writing the Department at least two weeks prior to need for funds. Total of advances and bills shall not exceed the annual grant amount for any snow season. The Club shall itemize all expenditures and include documentation as required by the Department.

7. Meet annually or more often with the other parties to this agreement to coordinate activities pursuant to this agreement.

8. Hold the Department and Forest Service harmless from and indemnify them from and against all liability for injuries to or death of persons or damage to property arising from the negligent or reckless acts of its employees or agents in carrying out the terms of this agreement.

B. THE FOREST SERVICE SHALL:

1. Allow its lands, in the areas indicated on the attached maps, to be used for snowmobiling.

2. Allow the Club, upon review and approval by the Forest Service and the Department of detailed annual operating plans, to improve trails by machine grading, cutting brush and small timber, minor bridge construction and other improvements as may be necessary.

3. Meet annually or more often with other parties to this agreement for the purpose of coordinating activities undertaken pursuant to this agreement.

4. When and if funds are available, make plastic blazers available to the Club for trail marking.

C. THE DEPARTMENT SHALL:

1. Reimburse the Club for the costs it incurs for grooming trails not to exceed the annual grant amount per snow season. Costs shall be based upon rates established through negotiation with local contractors by the Club. The Department will have no liability for charges in excess of the annual grant amount per snow season, unless, within the sole discretion of the Department, it is determined that sufficient additional funds exist in the Snowmobile Trail Grooming Account. If funds are available in that account, grooming costs may be reimbursed after the maximum charge of the annual grant amount has been incurred by the Club, provided, however, that such reimbursement shall be at the sole discretion of the Department.

2. Monitor the Club for performance guidelines and safety, and periodically report to the Forest Service the adequacy of Club performance.

3. Meet annually or more often with the other parties to this agreement for the purpose of coordinating activities undertaken pursuant to this agreement.

4. Maintain and enforce guidelines of grooming according to USDA FSH 2309.18 Trails Handbook and appropriate Department guidelines.

5. An Annual Plan of Operation will be presented to the Forest Service by the Department for its approval prior to May 1 of each year.

D. IT IS MUTUALLY AGREED THAT:

1. Any proposed development or betterment projects will be jointly agreed to by the Cooperators prior to their initiation.

2. Nothing herein shall be construed as binding the Cooperators for the payment of money beyond the current fiscal year unless a financial plan for subsequent years has been approved by the Cooperators.

3. No contributions herein provided for shall entitle the Club or the Department to any share or interest in the said facilities other than the right to use the same under the regulations of the Forest Service. All improvements shall be and remain the property of the United States.

4. Permission to work on National Forest Lands under the terms of this Agreement do not in any way convey to the Club or the Department, their officials, or any person or persons working with the Forest Service in the performance of said work, employee status that would extend to them the benefits of the Federal Employees Compensation Act, as amended.

5. The snowmobile trails and facilities will be open to the general public. The Club and the Department will in no way control access to or use of the trails or improvements.

6. No member of, or delegate to, Congress or Resident Commissioner shall be admitted to any share or part of this Agreement, or to any benefit that may arise therefrom; but this provision shall not be construed to extend to this Agreement if made with a corporation for its general benefit.

7. Cooperators will comply with Title VI of the Civil Rights Act of 1964 (P.L. 88-352) and in accordance with Title VI of that Act, no person in the United States shall, on the ground of race, color, handicap, or national origin, be excluded from participating in, be denied the benefits of, or be otherwise subjected to discrimination under any program or activity for which the Cooperators receive Federal financial assistance and will immediately take any measures necessary to effectuate this Agreement.

8. The Club and the Department shall indemnify the United States against any liability for damage to life or property arising from the occupancy or use of National Forest lands under this Agreement, providing such damage to life or property is due to the negligent acts or omissions of the Club or Department.

9. This Agreement may be revised as necessary, by mutual consent of all parties, by the issuance of a written amendment, signed and dated by all parties.

10. The rights and obligations of any party to this agreement

may be terminated upon the giving of thirty (30) days written notice by that party. Unless terminated by written notice, this Agreement will remain in force indefinitely.

IN WITNESS WHEREOF, the parties hereto have executed this Agreement as of the last date written below.

__________________________ NATIONAL FOREST

BY_________________________________

TITLE______________________________

DATE_______________________________

MONTANA DEPARTMENT OF FISH,
WILDLIFE AND PARKS

BY_________________________________

TITLE______________________________

DATE_______________________________

___________________ SNOWMOBILE CLUB

BY_________________________________

TITLE______________________________

DATE_______________________________

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SNOWMOBILE GROOMING PROGRAM

Regional Wildlife Clearance

☐ Trail expansion (attach map highlighting expansion)

☐ New trail system (attach map highlighting trail system)

____

Snowmobile Club

Are there any wildlife concerns? YES ☐ NO ☐

If yes:

Species ____________________________________

____________________ (list)

1. Winter range ____________________________________
____________________ (area)

2. Travel corridor ____________________________________
____

3. Other ____________________________________
____

Suggested alternate route ____________________________________

____

____

Other mitigation measures (such as signing; trail restrictions, etc.)

____

____

☐ Approved with above-mentioned mitigation measures

☐ Not approved as submitted

______________________________ ____________________

____

Regional Wildlife Biologist Date Regional Parks Manager
Date

3/91

APPENDIX C

DEPARTMENT EQUIPMENT LIST

Montana Snowmobile Equipment Inventory

28-Mar-91

Equipment	Serial Number	FWP Prop. Number	Year of Manf.	Date Purchased	Replace in FY	Purchase Price	Annual Depreciation	Location
Bombardier 252	511770035	8424	1977	08-84	1994	$20,000	$1,800	Eureka Ten Lakes
LMC 3300	037	6606	1980	11-80	1993	$53,285	$4,796	Libby Snowcats
LMC 1200	07-Nov-04	6608	1978	11-81	1993	$23,000	$1,882	Dillon Beaverhead Snowriders
LMC 1450	17-Mar-03	1639	1978	02-79	1994	$25,655	$1,924	Hobson Little Belters
LMC 1450	09-Apr-03	6613	1978	10-81	1995	$20,500	---	Anaconda Snowmobilers
Tucker Sno-Cat 1642	3863744	8618	1986	01/14/86	1996	$67,803	$5,127	Missoula Snowgoers
PB 200	108132561	6611	1984	07-Jun-05	1997	$85,219	$6,972	W.Yellowstone Snowmobilers
Tucker Sno-Cat 2000	3873776	8978	1987	02/06/87	1998	$61,299	$4,855	Bozeman Gallatin Valley Snowmobiler Assoc.
PB2400	WKK 81400001010	900797	1987	12/13/88	1999	$75,000	$7,375	West Yellowstone Snowmobilers
Tucker SnoCat 2000 with Maxey groomer	3883809	900365	1987	10-87	2000	$73,951	$5,412	Lincoln Ponderosa Snow Warriors
PB 170	WKK 813-8210-96	8375	1982	05-Jun-05	2001	$84,275	$6,895	Seeley Lake Driftriders
PB2000	U-PB200.8211736	901055	1987	10-30-89	2002	$66,420	$8,225	Great Falls Snowmobilers, Inc.
PB 1300	81300001011838	9696003	1985	10-90	2001	$37,200	$2,418	Helena Snowdrifters
PB 2000	81300008210974	1696000	1984	10-90	2000	$45,500	$2,951	Kalispell Flathead Snowmobile Assoc.
Double Tracks:								
Ski-Doo Alpine	332300437	6483	1979	02-Jun-05	1993	$3,449	$560	Polson Mission Mountain Snowmobilers
Ski-Doo Alpine	332300492	6482	1979	11-79	1992	$3,449	---	Hamilton Bitterroot Ridge Runners
Ski-Doo Alpine	332300970	6422	1979	07-80	1993	$3,175	$518	Livingston Big Sky Snowriders
Aktiv Grizzly	510084	8592	1985	12/17/85	1994	$6,250	$700	Anaconda Snowmobilers
Ski-Doo Alpine	334400159	900033	1987	04/15/87	1995	$5,000	$714	Hamilton Bitterroot Ridge Runners
Ski-Doo Alpine II	334500198	900348	1988	10-87	1996	$6,175	$924	Wisdom Big Hole Snowmobilers
Ski-Doo Alpine II	334800321	900752	1988	12-88	1997	$6,649	$959	Virginia City Snowmobilers
Ski-Doo Alpine II	3350000339		1989	11-89	1998	$7,168	$896	Wise River Jack Pine Savages
Ski-Doo Alpine II	3350000343		1989	11-89	1999	$7,168	$896	Big Timber Sweet Grass Co. Recreation Assoc.
Grooming Implements:								
Trailmaster Grooming Imp	None	900003	1987	01/29/87	2002	$8,300	$387	West Yellowstone Snowmobilers
Trail grooming implement	None	900489	1988	05/01/88	2000	$7,950	$443	Eureka Ten Lakes
Maxey Mt. Special	10-Apr-00	900865	1988	12-23-88	1997	$8,295	$648	West Yellowstone Snowmobilers
Maxey Model 848	GC-MMC-051	900860	1988	12-23-88	1997	$1,595	$170	Virginia City Snowmobilers
Trail grooming implement		1654		01-79		$1,100	---	Description: 56"W x 86"L
Maxey Model 848	MMC-045	900054		05-87	1997	$1,556	---	Hamilton Bitterroot Ridge Runners
Maxey Model 848	GS-MMC-047	900363		10-87	1998	$1,850	---	Wisdom Big Hole Snowmobilers
Maxey Model 848	GS-MMC-055		1989	11-89	1998	$1,000	$178	Wise River Jack Pine Savages
Maxey Model 848	GS-MMC-056		1989	11-89	1999	$1,000	$178	Big Timber Sweet Grass Co. Recreation Assoc.
Trail Tiller	U-4.2PT.5000011		1985	11-90	2001	$2,700	$147	Kalispell Flathead Snowmobile Assoc.
Trail Tiller	09-804-819-16	901550	1985	10-90	2000	$7,800	$468	Helena Snowdrifters
*Snowmobiles:								
Yamaha Excel III	8YE-1555	8351	1985	10-84		$2,126		Region Three
Ski-Doo Safari 377	00882	8145	1984	01-84		$2,284		Region Eight (Helena)
Arctic Cat Pantera	8505033	8567		07-85		$3,185		Region Two
Arctic Cat Panther	61510	6484		11-79		$2,148		Region Five
Yamaha Excel III	8YE-1648	8352	1985	10-84		$2,126		Region Three
Ski-Doo Safari Voyager	322601041	900768	1988	07-88		$3,649		Region One
Polaris Indy Trail	1605711	900794	1988	08-88		$3,540		Region Two
Polaris Indy Trail	1605595	900637	1988	07-88		$3,362		Region Three
Yamaha Phazer	84J-002753	900711	1988	08-88		$3,436		Region Four
*Trailers:								
Trailer		3749		11-78		$525		Region Three
Trailer		3851		07-86		$850		Region Three
Trailer, Currier		1659		02-79		$850		
Trailer, Currier		1653		02-79		$850		
Trailer		3748		11-78		$479		Region one
TOTAL						$866,641	$69,808	

*Snowmobiles and trailers not purchased through snowmobile equipment account--therefore, no depreciation.

APPENDIX D

CULTURAL RESOURCES COMPLIANCE PROCEDURES

There are a number of existing laws and statutes which provide for consideration of and protection of cultural resources. These laws apply to public lands (state and federal) and apply to lands or developments controlled by federal permitting or where federal funding is involved. These cultural resource laws include the Antiquity Act of 1906, the National Historic Preservation Act of 1966, the National and Environmental Policy Act of 1969 (and subsequent amendments), Executive Order 11593 of 1971, Federal Land and Policy Management Act of 1976, Archaeological Resources Protection Act of 1979, the Montana Environmental Policy Act, and the American Indian Religious Freedom Act.

The United States Department of the Interior-National Park Service has taken on the responsibility of seeing that the intent of these laws be carried out. The National Park Service has issued a series of regulations which detail the treatment of cultural sites and outline how recorded sites should be evaluated. Significance criteria have been established. In Montana the administrative representative of the National Park Service which deals with cultural sites is the Montana State Historic Preservation Office which is part of the Montana Historical Society in Helena.

The two largest federal land managing agencies in Montana are the Bureau of Land Management and the Forest Service. Both agencies employ a number of cultural resource specialists at various levels. Most snowmobile trail systems in Montana occur on lands managed by these agencies. Both the BLM and the Forest Service have manuals which detail cultural resource management regulations. BLM and FS management policies require foot reconnaissance (Class III survey) of most new developments on their lands. Foot (hiking) trails, ski trails, horse trails and snowmobile trails are viewed as developments which may require cultural resource investigations (Halcyon LaPoint, Custer Forest, personal communication 11/27/92). Class III survey of these developments are most often carried out by agency archaeologists.

These agencies have a memorandum of agreement with the Montana State Historic Preservation Office which states that trail development which occurs within the prism of an existing trail need not require cultural resource survey (Gary Fairchild, Helena Forest, personal communication 11/30/92). The exception to this agreement are trails which themselves may qualify as historic sites. Some existing Forest Service hiking and horse trails were constructed over 50 years ago and could be eligible for inclusion in the National Register of Historic Places. However the Montana Historic Preservation Office also recommends that when a non-motorized vehicle trail is changed to a motorized vehicle trail, that cultural resource compliance work be undertaken (Gary Fairchild, p.c. 11/30/92). The State Historic Preservation Office also requires that all new trail construction and trail rerouting which involves undisturbed lands be preceded by Class III survey.

Other cultural resource compliance exclusions may apply on a case by case review between the agency and the State Historic Preservation Office. These exclusions may involve new trail constructions or reroutes which occur on very steep and/or heavily timbered slopes where cultural sites are less likely to occur (Gary McLean, Flathead Forest, personal communication 11/30/92). However some cultural site types could occur in such environments and include scarred trees, stone quarries, rock art, rockshelters and caves, and traditional or sacred sites. Therefore the Historic Preservation Office stresses that each development situation be carefully reviewed before an exclusion is granted.

The Bureau of Land Management and the United States Forest Service have their own staff of archaeologists who insure that compliance with existing cultural resource laws occurs prior to proposed developments. Snowmobiling and trail construction are regulated on BLM and FS lands. Therefore there is already a cultural resource compliance structure in place on those federal lands.

Lack of cultural evaluations for funded snowmobile trail projects would not have dire consequences for cultural resources on BLM or Forest Service lands. However other state and federal land managing agencies may be involved with a particular proposed trail. Not all agencies have staff archaeologists although compliance with cultural resource laws is required on all public lands projects. In instances where agency archaeologists are not on staff or are unavailable for field visits, a snowmobile club would likely be required to contract with a consulting archaeologist to provide necessary professional services associated with cultural resource compliance.

Snowmobile trails or trail segments on private land are a particular concern. Presently compliance with cultural resource laws is only required in unusual cases on private land. Implementation of modifications under alternative 3 in this programmatic EIS would insure that cultural resources on private land are considered when a snowmobile club applies for F,W and P funding.

The first step in cultural resource compliance involves a literature search to determine what known cultural resource sites (prehistoric, historic, and Native American traditional) occur in the project area. A literature search can involve a search of site files at the SHPO and can involve a search of historic and contemporary documents.

Next a Class III survey is required. This ground reconnaissance involves inspection of the project area and identification of all cultural sites found during a pedestrian survey carried out by professional archaeologists. Once sites have been identified and recorded they go through an evaluation process which might require an additional step of subsurface testing. The evaluation process is necessary to determine the significance of a particular site and to determine if a site is either eligible or potentially eligible for nomination to the National Register of Historic Places (NRHP).

Only cultural sites determined as eligible or potentially eligible to the NRHP must go through mitigation treatment. Mitigation treatments for specific NRHP-eligible sites are developed on a site by site basis and must meet with concurrence from the Montana SHPO. Mitigation beyond baseline recording is often unnecessary for sites determined as not eligible for inclusion in the NRHP.

Part of the evaluation process for determining the significance of Native American traditional sites requires consultation with members of a tribe either living in close proximity to a project area or known to have historically occupied a project area.

Once a significant Native American traditional site has been identified mitigation is required. Native Americans often find any impact to sacred sites as unacceptable. Therefore the only acceptable mitigation under these circumstances would be avoidance of the site. If a Native American traditional site lies along a planned snowmobile route then rerouting is advisable. Rerouting should take the planned trail far enough from a site to avoid not only physical disturbance but to avoid visual and auditory disturbance.

Mitigation similar to that described in the preceding paragraph may be appropriate for significant historic sites. Rerouting of planned snowmobile trails to avoid visual intrusions as well as physical disturbance may be necessary.

As a rule, avoidance of all archaeological sites is the preferred mitigation when possible. Avoidance reroutes of planned snowmobile trails must be taken far enough from an archaeological site to insure that disturbance from direct or associated actions is prevented. As described above sometimes rerouting requires enough distance and/or topographic designing to prevent auditory or visual intrusions.

APPENDIX E

DRAFT PEIS COMMENTS AND RESPONSES

1. INTRODUCTION

The draft Programmatic Environmental Impact Statement (PEIS) for the Montana Department of Fish, Wildlife and Parks was published and released for public review on March 30, 1993. The Notice of Availability was released in newspapers across the state providing information on where the draft PEIS could be reviewed, how to receive a copy of the draft PEIS, dates and locations for public hearings and the closing dates for comments. Public hearings were held in Bozeman, Missoula, Kalispell, and Helena the week of April 26, 1993. Written comments were to be postmarked no later than April 30, 1993. No formal request for an extension of the review process was received under ARM 12.2.439.

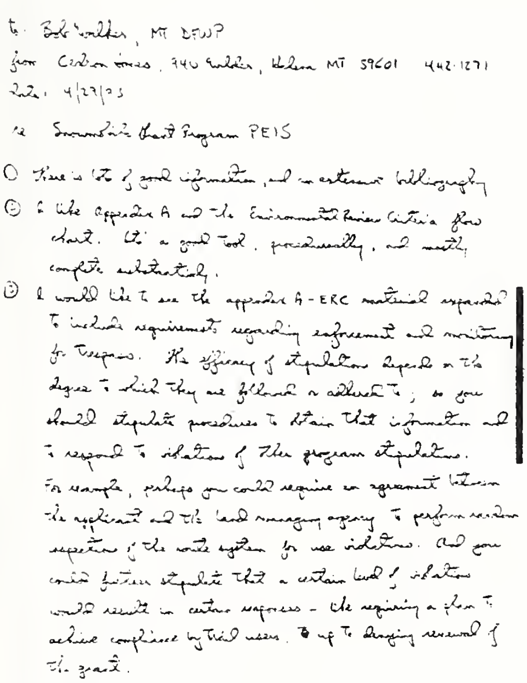
In this appendix, the Department responds to substantive comments received on the draft PEIS. Substantive comments are those that question analyses or procedural steps. Statements of support or objection to the program and other personal opinions are acknowledged and are reproduced as oral or written testimony in Section 3. However, the Department cannot respond to these comments.

Each substantive comment has been assigned a number corresponding to the letter received, or to the town in which oral testimony was received, followed by a comment number (e.g. Letter 1, fourth comment would be comment 1-4; oral testimony in Bozeman, fourth comment would be B-4). Responses to these comments are presented in Section 3.

Revisions, deletions, and additions to the text of the draft PEIS have been made to address concerns where appropriate.

2. Public Comments

1



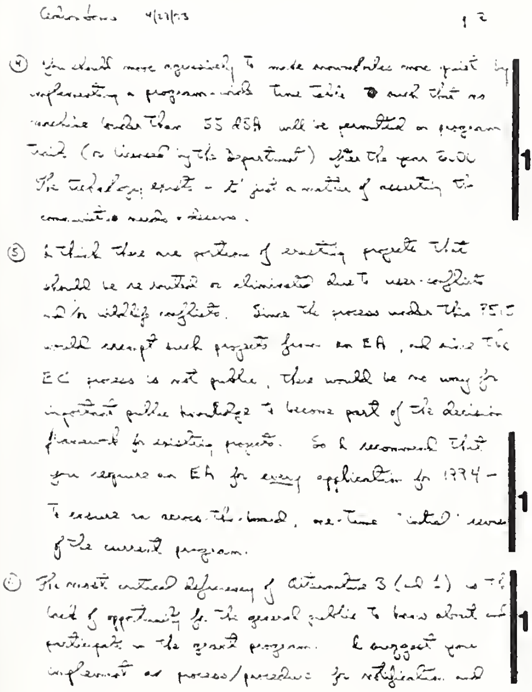
to: Bob Walker, MT DFWP
from: Cedron Jones, 740 Boulder, Helena MT 59601 442-1271
date: 4/27/93

re: Snowmobile Grant Program PEIS

① There is lots of good information, and an extensive bibliography

② I like Appendix A and the Environmental Review Criteria flow chart. It's a good tool, procedurally, and mostly complete substantively.

③ I would like to see the appendix A-ERC material expanded to include requirements regarding enforcement and monitoring for trespass. The efficacy of stipulations depends on the degree to which they are followed or adhered to; so you should stipulate procedures to obtain that information and to respond to violations of the program stipulations. 1-1 For example, perhaps you could require an agreement between the applicant and the land managing agency to perform random inspections of the route system for use violations. And you could further stipulate that a certain level of violations would result in certain responses - like requiring a plan to achieve compliance by trail users, or up to denying renewal of the grant.

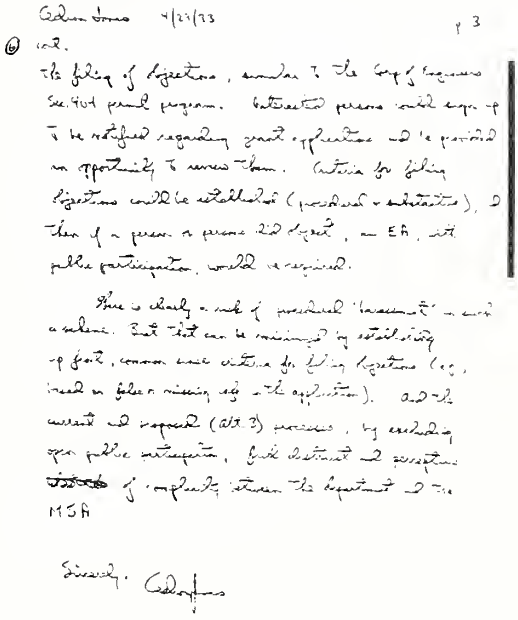


Cedron Jones 4/27/93 p 2

④ You should move aggressively to make snowmobiles more quiet by implementing a program-wide time table such that no machine louder than 55 dBA will be permitted on program trails (or licensed by the Department) after the year 2000. The technology exists - it's just a matter of accepting the community's needs & desires. 1-2

⑤ I think there are portions of existing projects that should be re-routed or eliminated due to user-conflicts and/or wildlife conflicts. Since the process under this PEIS would exempt such projects from an EA, and since the ERC process is not public, there would be no way for important public knowledge to become part of the decision framework for existing projects. So I recommend that you require an EA for every application for 1994 - to ensure an across-the-board, one-time "initial" review of the current program. 1-3

⑥ The most critical deficiency of Alternative 3 (and 1) is the lack of opportunity for the general public to know about and participate in the grant program. I suggest you implement a process/procedure for notification and 1-4



Cedron Jones 4/27/93 p 3

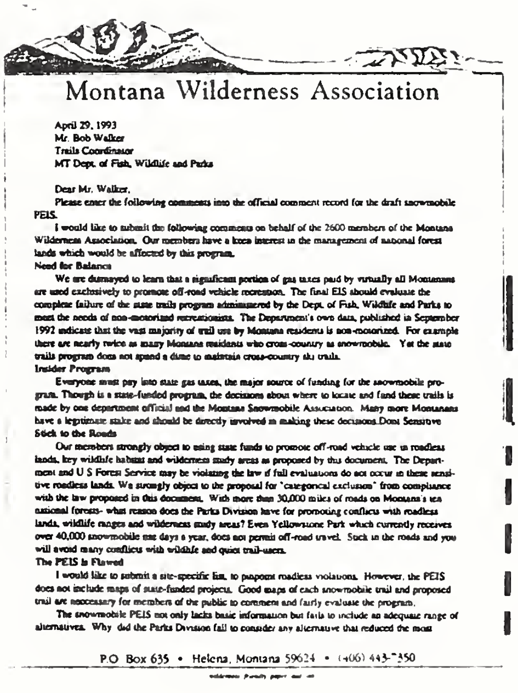
⑥ cont.

the filing of objections, similar to the Corps of Engineers Sec. 404 permit program. Interested persons could sign up to be notified regarding grant applications and be provided an opportunity to review them. Criteria for filing objections could be established (procedural & substantive), and then if a person or persons did object, an EA, with public participation, would be required. 1-4

There is clearly a risk of procedural "harassment" in such a scheme. But that can be minimized by establishing up front, common sense criteria for filing objections (e.g., based on false or missing info in the application). And the current and proposed (Alt 3) processes, by excluding open public participation, build distrust and perceptions ~~[illegible]~~ of complicity between the Department and the MSA

Sincerely, Cedron Jones

2



Montana Wilderness Association

April 29, 1993
Mr. Bob Walker
Trails Coordinator
MT Dept. of Fish, Wildlife and Parks

Dear Mr. Walker,

Please enter the following comments into the official comment record for the draft snowmobile PEIS.

I would like to submit the following comments on behalf of the 2600 members of the Montana Wilderness Association. Our members have a keen interest in the management of national forest lands which would be affected by this program.

Need for Balance

We are dismayed to learn that a significant portion of gas taxes paid by virtually all Montanans are used exclusively to promote off-road vehicle recreation. The final EIS should evaluate the complete failure of the state trails program administered by the Dept. of Fish, Wildlife and Parks to meet the needs of non-motorized recreationists. The Department's own data, published in September 1992 indicate that the vast majority of trail use by Montana residents is non-motorized. For example there are nearly twice as many Montana residents who cross-country as snowmobile. Yet the state trails program does not spend a dime to maintain cross-country ski trails. 2-1

Insider Program

Everyone must pay into state gas taxes, the major source of funding for the snowmobile program. Though is a state-funded program, the decisions about where to locate and fund these trails is made by one department official and the Montana Snowmobile Association. Many more Montanans have a legitimate stake and should be directly involved in making these decisions.Dont Sensitive 2-2

Stick to the Roads

Our members strongly object to using state funds to promote off-road vehicle use in roadless lands, key wildlife habitat and wilderness study areas as proposed by this document. 2-3 The Department and U S Forest Service may be violating the law if full evaluations do not occur in these sensitive roadless lands. 2-4 We strongly object to the proposal for "categorical exclusion" from compliance with the law proposed in this document. With more than 30,000 miles of roads on Montana's ten national forests- what reason does the Parks Division have for promoting conflicts with roadless lands, wildlife ranges and wilderness study areas? Even Yellowstone Park which currently receives over 40,000 snowmobile use days a year, does not permit off-road travel. Stick to the roads and you will avoid many conflicts with wildlife and quiet trail-users. 2-5

The PEIS is Flawed

I would like to submit a site-specific list, to pinpoint roadless violations. However, the PEIS does not include maps of state-funded projects. Good maps of each snowmobile trail and proposed trail are necessary for members of the public to comment and fairly evaluate the program. 2-6

The snowmobile PEIS not only lacks basic information but fails to include an adequate range of alternatives. Why did the Parks Division fail to consider any alternative that reduced the most 2-7

P.O Box 635 • Helena, Montana 59624 • (406) 443-7350 serious conflicts by focusing state snowmobile programs away from roadless lands, wildlife ranges and wilderness study areas? Perhaps the document merely reflects the fundamental imbalance of the state-funded trail programs and the fact that there is no advocate for the majority of Montana residents who prefer quiet trails to motorized. The Department has swept legitimate conflicts and issues under the rug, rather than dealing with them in the draft PEIS **2-8**

Most Montanans Prefer Quiet Trails

In a survey of 2,000 Montana residents completed in August of 1992, 70% disagreed with the statement that more areas of the national forests should be available for motorized recreation, including snowmobiling. **2-9**

These findings closely mirror those of user-data compiled by both the state and federal government. Most Montanans prefer quiet trails. And it's a fact that there are fewer and fewer quiet trails every year, as minority of motorized users displace those who take to Montana's backcountry trails to enjoy the peace and silence of nature.

Sincerely,
Joe Gatchell
John Gatchell
Conservation Director

4

April 27, 1993

Mr. Bob Walker
Fish, Wildlife & Parks
State of Montana
Helena, Montana 59620

Dear Mr Walker.

There is no reason why your Department should even consider motorizing winter range of elk and other wildlife now or in the future. Keep these areas off limits to people and machines. Let these people ride around farmers fields and on roads outside wildlife areas. Let man saturate himself with his own noise. **4-1**

Sincerely,

>PLoL·b·
Long Standing Bear Chief
Drawer V
Browning, Montana 59417

SPOO-PII

Spoo-pii
Blackfoot word for turtle,
An Ancient Being
The turtle image is used by
my People to symbolize
a long and healthful life
Spoo-pii
is slow and deliberate
Spoo-pii
knows who he is
and where he is
going each day of his life
Spoo-pii
never takes a challenge
that cannot be
accomplished
His movements are such
that one hardly
notices his presence
Spoo-pii
is never loud and
boisterous nor does he
bring dangerous attention
to himself
The Creator so loves
Spoo-pii
that in the beginning
of time He gave him
a beautiful protective shell
and painted his body
so that his person
would be protected
from danger and violence
Spoo-pii
does not harm anyone
The gift of the image of
Spoo-pii
is a symbolic way
of wishing a person
a long beautiful life,
a long, healthy life of
Gentle Kindness

Mi-sa-mi-pai-poi-li
Ni-nona Kyi-yo
Long Standing
Bear Chief
Blackfoot Nation
Drawer V
Browning, MT 59417

3

17 Division Street
Helena, MT 59601
April 28, 1993

Pat Graham, Director
Montana Dept. of Fish, Wildlife & Parks
1420 East 6th Av.
Helena, MT 59620

Dear Mr. Graham:

I wish to comment on your plans for increased mileage of snowmobile trails.

I feel that the snowmobilers as a highly organized, highly financed, and vocal minority of recreational users are getting an inordinate amount of the resources of the Parks Division. I have always felt a little bitter that snowmobilers get colossal funding for grooming, trail development, brochures, etc. etc. while cross country skiers, who represent far more people, but are generally quiet and little organized barely get a pittance. I remember a few years ago the struggle it took to get one little parking area at Frontier Town. I believe in the end that was built by the Forest Service and the Highway Dept. with no Fish & Game involvement. This in spite of the fact that cross-country skiers also use gasoline in getting to our trails and could thus justifiably get assistance from the gas tax. **3-1**

However, this newest plan beats all. As I understand it with this new gasoline tax money available for trails, a large percentage of it is going to building new trails into pristine areas, many of them under wilderness study or adjacent to wilderness areas. This is unconscionable. Where are your heads? How can you justify establishing a formal snowmobile use pattern in areas that are being considered for wilderness? I believe we have more than enough quality snowmobile trails for the relatively small number of users. Because of the lack of good ski trails in the Helena area, the past winter or two I have started skiing on some of the groomed and improved snowmobile trails in the Mullen Pass and Rimini areas. They are little used. In a full day of skiing maybe one or two parties of snowmobilers will pass us. When the existing trails are so little used, how can you justify spreading that use further into previously quiet areas used by skiers. We have so few areas where we do not have to contend with the noise and smell of snowmobiles (even though few in numbers they are huge in impact). **3-2**

The trail money should go to maintaining and repairing the current trails, in particular the hiking and horse trails which are often in sorry condition. In addition a limited number of new trails should be built for non-motorized use only in areas close to towns which would provide easily accessible recreational opportunities for all Montanans, not just the few who prefer motors to their God-given feet. **3-3**

Sincerely,

Ellie Arguimbau

5

Bob Walker

4/30/93

I am here today to remind you of MCA 87-1-2[illegible]

State Parks wants to motorize Winter Ranges and I am dead set against it! Is not a [illegible] of E&L Displacement of elk and grizzly [illegible] **5-1**

I feel instead we should develop an Alternative to spend more money on Enforcement — ie Snowmobile education on Legality as well as penalties for violators ... and there were many last year! **5-2**

The recent PEIS is using many old + unapplicable studies to substantiate its validity. **5-3**

PEIS also is failing to consider the Impact of noise on wildlife **5-4**

NEPA + EOs 11644/11989 have not been implemented & I demand they be! **5-5**

Laurie [illegible]
855 [illegible]
Whitefish MT 59937

6

E F & C F PRACH
110 GOAT TRAIL
WHITEFISH, MT. 59937

Apr. 30, 1993

Ed Walker
MDFWP Div.
1420 E 6th
Helena, MT 59620

Dear Mr. Walker:

With regard to the PEIS on the State Snowmobile grant proposal, I have problems with all of your alternatives for the following reasons:

1 - I object to increasing snowmobile use of public, especially Forest Service, lands, the latter over which you have no jurisdiction. **6-1**

2 - I feel that management of snowmobile use should be supported solely by fees paid for by the users. **6-2**

3 - If any portion of our tax money should be voted for such use, it should be shared equally by mountain bike users and hikers for their use of public lands **6-3**

4 - Having seen the intrusions by snowmobile users in such areas on a first basis, any funding should include more support of enforcement. **6-4**

Very truly yours,
Edwin F. Prach, PE

7

MADISON GALLATIN ALLIANCE

RECEIVED
APR 2- 1993

April 27, 1993

Mr. Bob Walker
Montana Department of Fish, Wildlife & Parks
1420 East Sixth Ave.
Helena, MT. 59620

Re: Snowmobile Program Draft PEIS

Dear Bob:

Thank you for the opportunity to review and comment on the draft Programmatic Environmental Impact Statement for the Department's Snowmobile Program. I'm writing on behalf of the Madison-Gallatin Alliance, a 300-member conservation group based in Bozeman

Three general points First, we endorse the Department's preferred alternative, alternative 3, with some modifications. This alternative appears to be a sincere effort to incorporate mitigations of environmental and other effects of the snowmobile program We applaud this approach. To be truly effective though, the management plan needs to be beefed up some - see below

Second, we strongly feel that the groomed trails in the current system must undergo this enhanced level of environmental scrutiny. I'm not exactly certain, but I got the impression from the hearing the other night that you mean to do this. This new review may well reveal problems with existing trails, such as conflicts with wintering elk herds, soil erosion on bare, windblown ridges, etc. When such problems turn up, we expect the Department to work with the grant applicants to re-route trails, enforce seasonal closures and signage, and do whatever else is necessary to alleviate these problems.

Third, we strongly believe it should be Department policy not to fund the grooming of trails in Wilderness Study Areas. Someday (some year, some decade) wilderness designation decisions for all Montana public lands will have been completed, and there will be no such areas Until then, it is inappropriate to encourage motorized use in roadless areas that are under consideration for wilderness designation. Such use is likely to substantially change the character of these areas. This important land use decision cannot **7-1**

be made by DFWP, but only by our representatives in Congress, in a wilderness bill. Therefore, we ask that you make Wilderness Study Areas off-limits for Program funding

Specific comments follow

Page 26 - Seasonal restrictions. Bald eagle nesting areas also need to be declared off-limits in the late season. Consult the Beaverhead Forest for the kind of headaches this conflict can cause (birdwatchers are very determined people). **7-2**

Seasonal trail-use restrictions may also need to include physically blocking off the trailhead. Many people will just zoom around a sign. **7-3**

p. 28 - Issue 8 - Safety. All public awareness programs should include warnings to watch for X-C skiers This is a major safety issue in Montana, not so much on groomed snowmobile trails as on the Forest Service road systems that both groups use. Grant applications should include a description of where in the vicinity of the proposed trail people ski (not just on formal ski trails), and an explanation of how potential safety issues will be resolved. **7-4**

p. 29 - Issue 9 - Wilderness, opportunities for solitude. No groomed trails in WSA's - see above. The intention to avoid existing ski trails is good, but in fact there are very few groomed ski trails in the backcountry; most people ski on forest roads. The language here should be changed to take into account popular X-C ski areas, not just trails. **7-5**

The periodic trail inspections by the Department should include the area around the groomed snowmobile trail, since the presence of the trail opens up a wide additional area for snowmobile access. I have seen mucked-up creeks, erosion of bare ridgetops and snowmobile tracks entering wilderness areas in the vicinity of the Department's groomed trails far in the backcountry. The snowmobile program should have a formal mechanism for dealing with these things immediately when they are discovered by an inspection or report. **7-6**

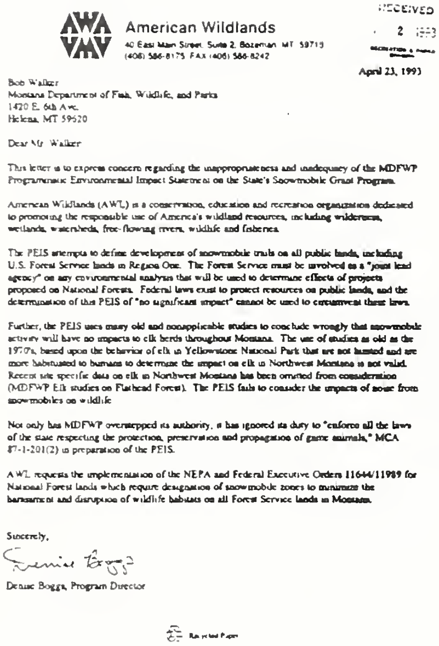
p. 83 - Affected environment - recreation. The Department's 1993 SCORP contains figures on visitor-hours for snowmobiling and X-C skiing in Montana, and they should be cited here. By your own figures there are half again as many hours expended X-C skiing than snowmobiling. It's inappropriate to minimize the potential conflicts or the importance of backcountry skiing in Montana. **7-7**

p. 100 - Land use. The grooming of a new snowmobile trail in a roadless area of predominantly non-motorized use would be a major change in land use, especially if it precluded the area from wilderness designation by Congress. That change should be acknowledged here. **7-8**

Thanks for all your good work, Bob

Sincerely,
Gretchen Rupp
Gretchen Rupp
President, Madison-Gallatin Alliance

8



American Wildlands
40 East Main Street, Suite 2, Bozeman, MT 59715
(406) 586-8175 FAX (406) 586-8242

RECEIVED
2 1993

April 23, 1993

Bob Walker
Montana Department of Fish, Wildlife, and Parks
1420 E. 6th Ave.
Helena, MT 59620

Dear Mr. Walker:

This letter is to express concern regarding the inappropriateness and inadequacy of the MDFWP Programmatic Environmental Impact Statement on the State's Snowmobile Grant Program.

American Wildlands (AWL) is a conservation, education and recreation organization dedicated to promoting the responsible use of America's wildland resources, including wilderness, wetlands, watersheds, free-flowing rivers, wildlife and fisheries.

The PEIS attempts to define development of snowmobile trails on all public lands, including U.S. Forest Service lands in Region One. The Forest Service must be involved as a "joint lead agency" on any environmental analysis that will be used to determine effects of projects proposed on National Forests. Federal laws exist to protect resources on public lands, and the determination of this PEIS of "no significant impact" cannot be used to circumvent these laws. 8–1

Further, the PEIS uses many old and nonapplicable studies to conclude wrongly that snowmobile activity will have no impacts to elk herds throughout Montana. The use of studies as old as the 1970's, based upon the behavior of elk in Yellowstone National Park that are not hunted and are more habituated to humans to determine the impact on elk in Northwest Montana is not valid. 8–2 Recent site specific data on elk in Northwest Montana has been omitted from consideration (MDFWP Elk studies on Flathead Forest). The PEIS fails to consider the impacts of noise from snowmobiles on wildlife. 8–3

Not only has MDFWP overstepped its authority, it has ignored its duty to "enforce all the laws of the state respecting the protection, preservation and propagation of game animals," MCA 87-1-201(2) in preparation of the PEIS. 8–4

AWL requests the implementation of the NEPA and Federal Executive Orders 11644/11989 for National Forest lands which require designation of snowmobile zones to minimize the harassment and disruption of wildlife habitats on all Forest Service lands in Montana. 8–5

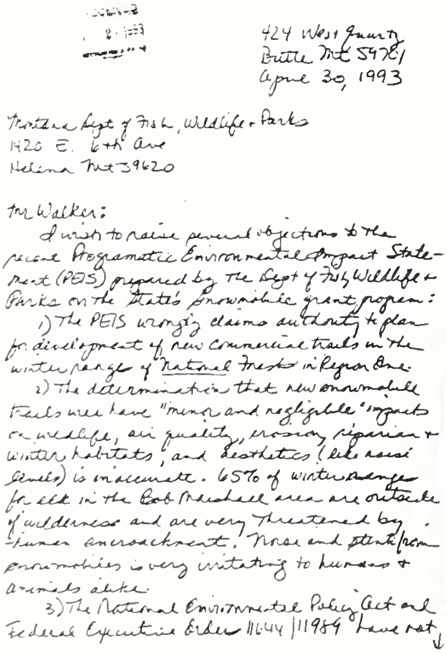
Sincerely,

Denise Boggs

Denise Boggs, Program Director

Recycled Paper

9



424 West Quartz
Butte Mt 59701
April 30, 1993

Montana Dept of Fish, Wildlife + Parks
1420 E. 6th Ave
Helena Mt 59620

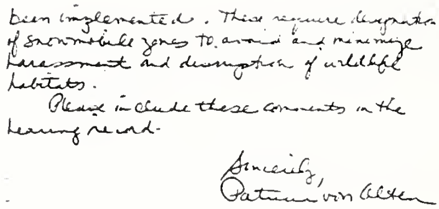
Mr Walker:

I wish to raise several objections to the recent Programatic Environmental Impact Statement (PEIS) prepared by The Dept of Fish Wildlife + Parks on the State's Snowmobile grant program:

1) The PEIS wrongly claims authority to plan for development of new commercial trails in the winter range of National Forests in Region One. 9–1

2) The determination that new snowmobile trails will have "minor and negligible" impacts on wildlife, air quality, erosion, riparian + winter habitats, and aesthetics (like noise levels) is inaccurate. 65% of winter ranges for elk in the Bob Marshall area are outside of wilderness and are very threatened by human encroachment. Noise and stench from snowmobiles is very irritating to humans + animals alike. 9–2

3) The National Environmental Policy Act and Federal Executive Order 11644/11989 have not ↓

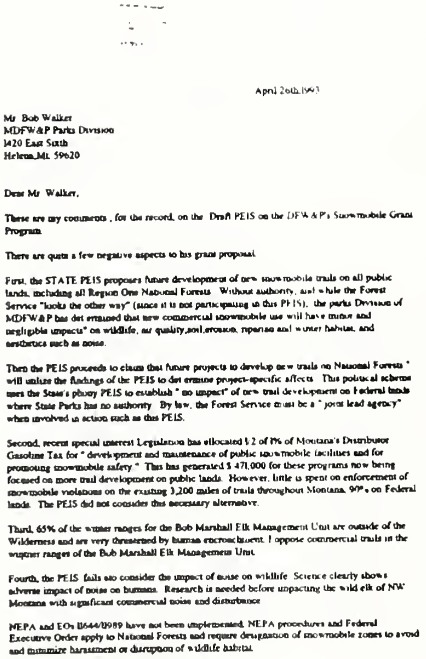


been implemented. These require designation of snowmobile zones to avoid and minimize harassment and disruption of wildlife habitats. 9–3

Please include these comments in the hearing record.

Sincerely,
Patricia von Alten

10



April 26th,1993

Mr. Bob Walker
MDFW&P Parks Division
1420 East Sixth
Helena,Mt. 59620

Dear Mr. Walker,

These are my comments , for the record, on the Draft PEIS on the DFW&P's Snowmobile Grant Program.

There are quite a few negative aspects to his grant proposal.

First, the STATE PEIS proposes future development of new snowmobile trails on all public lands, including all Region One National Forests. Without authority, and while the Forest Service "looks the other way" (since it is not participating in this PEIS), the parks Division of MDFW&P has det ermined that new commercial snowmobile use will have minor and negligible impacts" on wildlife, air quality,soil,erosion, riparian and winter habitat, and aesthetics such as noise. 10–1

Then the PEIS proceeds to claim that future projects to develop new trails on National Forests " will utilize the findings of the PEIS to det ermine project-specific affects. This political scheme uses the State's phony PEIS to establish " no impact" of new trail development on Federal lands where State Parks has no authority. By law, the Forest Service must be a " joint lead agency" when involved in action such as this PEIS. 10–2

Second, recent special interest Legislation has allocated 1/2 of 1% of Montana's Distributor Gasoline Tax for " development and maintenance of public snowmobile facilities and for promoting snowmobile safety." This has generated $ 471,000 for these programs now being focused on more trail development on public lands. However, little is spent on enforcement of snowmobile violations on the existing 3,200 miles of trails throughout Montana, 90% on Federal lands. The PEIS did not consider this necessary alternative. 10–3

Third, 65% of the winter ranges for the Bob Marshall Elk Management Unit are outside of the Wilderness and are very threatened by human encroachment. I oppose commercial trails in the wintner ranges of the Bob Marshall Elk Management Unit. 10–4

Fourth, the PEIS fails sto consider the impact of noise on wildlife. Science clearly shows adverse impact of noise on humans. Research is needed before impacting the wild elk of NW Montana with significant commercial noise and disturbance. 10–5

NEPA and EOs 11644/11989 have not been implemented. NEPA procedures and Federal Executive Order apply to National Forests and require designation of snowmobile zones to avoid and minimize harassment or disruption of wildlife habitat. 10–6

In summary, it is clear that the State is treading where it has no authority to trod. It does not have the authority to plan for development of new commercial trails in winter ranges of National Forests in Region One. Winter ranges such as Badger Two Medicine and Blackleaf on the East Front are low cases in point.

Sincerely,

Doris Milner

Doris Milner
65 Ricketts Road
Hamilton,Mt. 59840

April 28, 1993
Page Two

We also need to take a good look at our snowmobile grooming program and see what can be done to improve it and make it work for us. We had some real problems last season and we need to see this change.

We realize there are elk, deer, bear, bald eagle and moose habitat, as well as other forms of wildlife in this area. This is the primary reason most of us choose to live here. We love it. This also is one of the reasons many people are moving into our area.

Most of the large animals spend their winters in the valley floors where they can find food. The area where we snowmobile is up in the higher elevations in the deep snow, away from the wildlife. I believe the people who oppose snowmobiling because of the harm it does to the animal habitat are wrong. I don't think they see the full picture. There are very few of these people, but they are very strong minded and wish to control the majority. We should work hard to hang on to the things we enjoy and to do all we can to keep from losing our freedom of public use of National and State Forests. 11-1

I visited West Yellowstone about a month ago and crossed into Idaho and saw that their economy is especially good for a state whose winter economy was declining a few years ago. I noticed that there was an over-abundance of wildlife - elk, deer and buffalo herds. It is impossible to believe that snowmobiling has harmed them in any way. This can be true of us, too, if we keep a close watch on our environment and yet take advantage of our opportunities in this growing industry. I would encourage you to take the necessary steps to insure that the tourism in the winter months can continue to grow at the phenomenal rate we have seen these past few years. We need this growth to compensate for the lost jobs in our area.

We and our employees believe that this is a great place for work and recreation and we want to keep it that way.

ADVENTURE
MOTOR SPORTS
Fun that won't quit.
Authorized Yamaha Dealer Sales, Service, Parts & Rentals
1805 Hwy 2 West • Columbia Falls, MT 59912
406-892-2752

11

April 28, 1993

Mr. Bob Walker
Fish, Wildlife & Parks
Helena, MT 59635

Dear Bob:

Adventure Motor Sports is a Yamaha dealership, and we have been in business for almost two years. During the winter months we offer guided snowmobiles tours, and have been in operation for two seasons.

Our 1991/1992 season was good, considering it was our first year in the snowmobile rental business. We were able to keep up nicely with one full-time person hauling machines out of our store to the trail-head.

We were very pleased to see our 1992/1993 season increase substantially over the previous year. We had as many as seven people working full-time to keep up with the demand. And our business is not the only one to show a great increase in profit over the last few years. 11-1

I believe the snowmobile rental industry is vital to the economy in our area. We have seen it boost hotel, motel, grocery store, gas station and restaurant business. These dollars roll over three or four times before they leave the area. Over the years we have seen a lot of tourism here during the summer months and now we see our winter sports (skiing and snowmobiling) providing year-round profitability.

With all of the jobs that are lost in this area from the timber industry, lay-offs at Plum Creek and the Aluminum Plant, the job market is definitely in a slump. It is vital that we increase business here in every way we can, and tourism is an area we should use to our full advantage.

SNOWMOBILES • WAVE RUNNERS • ATV'S • MOTORCYCLES

April 28, 1993
Page Three

I believe that the Fish and Game in Montana has done an excellent job and will continue to do so.

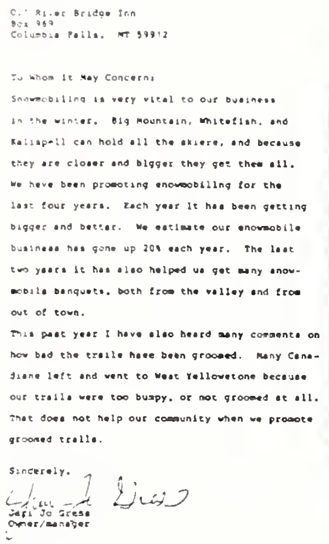
Sincerely,

Ted L. Nichols, Partners and Employees
Adventure Motor Sports

cc: Dave Conklen

Christine Nichols ______
Rick Chaffin ______
Toni Chaffin ______
Tod Foe Tod ______
Brenda Foe ______
Paul Anderberg P. Anderberg ______
Wes Kruse ______
Rory Kiser ______

12



C.F. River Bridge Inn
Box 969
Columbia Falls, MT 59912

To Whom It May Concern:

Snowmobiling is very vital to our business in the winter. Big Mountain, Whitefish, and Kalispell can hold all the skiers, and because they are closer and bigger they get them all. We have been promoting snowmobiling for the last four years. Each year it has been getting bigger and better. We estimate our snowmobile business has gone up 20% each year. The last two years it has also helped us get many snowmobile banquets, both from the valley and from out of town.

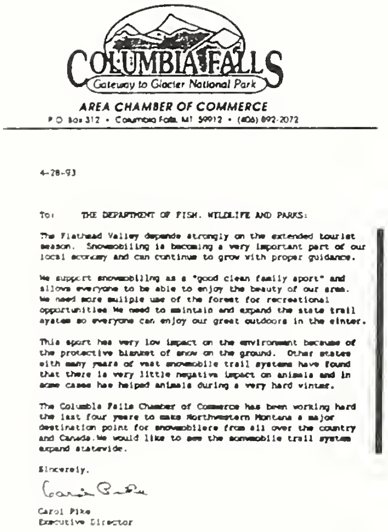
This past year I have also heard many comments on how bad the trails have been groomed. Many Canadians left and went to West Yellowstone because our trails were too bumpy, or not groomed at all. That does not help our community when we promote groomed trails.

12-1

Sincerely,

Jari Jo Gress
Owner/manager

13



COLUMBIA FALLS
Gateway to Glacier National Park
AREA CHAMBER OF COMMERCE
P.O. Box 312 • Columbia Falls, MT 59912 • (406) 892-2072

4-28-93

To: THE DEPARTMENT OF FISH, WILDLIFE AND PARKS:

The Flathead Valley depends strongly on the extended tourist season. Snowmobiling is becoming a very important part of our local economy and can continue to grow with proper guidance.

We support snowmobiling as a "good clean family sport" and allows everyone to be able to enjoy the beauty of our area. We need more muliple use of the forest for recreational opportunities We need to maintain and expand the state trail system so everyone can enjoy our great outdoors in the winter.

This sport has very low impact on the environment because of the protective blanket of snow on the ground. Other states with many years of vast snowmobile trail systems have found that there is very little negative impact on animals and in some cases has helped animals during a very hard winter.

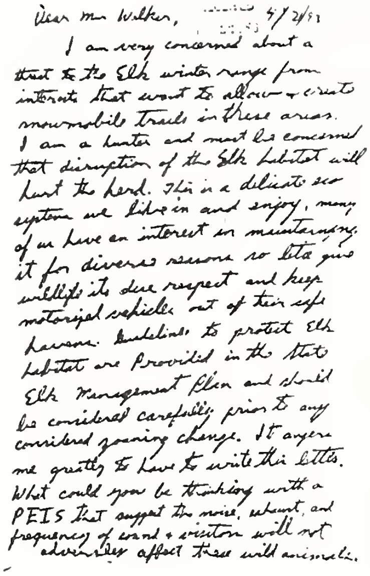
The Columbia Falls Chamber of Commerce has been working hard the last four years to make Northwestern Montana a major destination point for snowmobilers from all over the country and Canada.We would like to see the sowmobile trail system expand statewide.

13-1

Sincerely,

Carol Pike
Executive Director

14

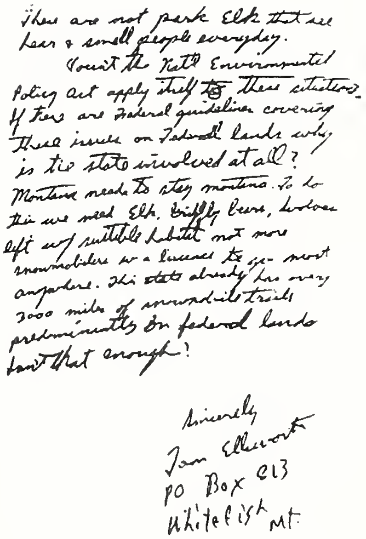


Dear Mr Walker, 4/21/93

I am very concerned about a threat to the Elk winter range from interests that want to allow & create snowmobile trails in these areas. I am a hunter and must be concerned that disruption of the Elk habitat will hurt the herd. This is a delicate eco system we live in and enjoy, many of us have an interest in maintaining it for diverse reasons so lets give wildlife its due respect and keep motorized vehicles out of their safe havens. Guidelines to protect Elk habitat are Provided in the State Elk Management Plan and should be considered carefully prior to any considered zoning change.

14-1

It angers me greatly to have to write this letter. What could you be thinking with a PEIS that suggest the noise, amount, and frequency of sound & visitors will not adversley affect these wild animals.



These are not park Elk that see hear & smell people everyday.

14-2

Doesn't the Nat'l Environmental Policy Act apply itself ~~to~~ these situations.

14-3

If there are Federal guidelines covering these issues on Federal lands why is the state involved at all?

14-4

Montana needs to stay montana. To do this we need Elk, Grizzly bears, wolves left w/ suitable habitat not more snowmobilers w a license to go most anywhere. This state already has over 3000 miles of snowmobile trails predominantly on federal lands isn't that enough!

Sincerely
Tom Ellsworth
PO Box 813
Whitefish MT

15

APRIL 13, 1993

DARBY, MONTANA 59829

MR. BOB WALKER
DEPARTMENT OF FISH, WILDLIFE & PARKS
1420 EAST SIXTY AVE
HELENA, MONTANA 59620

DEAR SIR:

HAVING READ THE ALTERNATIVES YOU HAVE PRESENTED IN YOUR IMPACT STATEMENT, I FOR SURE PREFER ALTERNATIVE I.

HAVING SNOWMOBILED EVER SINCE THEY HAVE MADE THEM, I NOT SEEN ANY ADVERSE AFFECTS ON THE INVIORNMENT IN ANY WAY.

THE LAST THING WE NEED IS MORE RULES & REGULATIONS ADMINISTERED BY THE FISH & GAME DEPARTMENT AND THE FOREST SERVICE. I THINK THE DEPARTMENT IS MAKING A LOT TO DO OVER NOTHING.

15-1

YOURS TRULY

FRANCIS SARGENT

16

4/28/93
10:25 A.M.

Hello Bob Walker,

I am here at the Kalispell office of the Montana Department of Fish, Wildlife, and Parks a few hours early. Due to schedule conflicts, I will not be able to be here this afternoon when you and the Forest Service people are to be here.

As a resident of the Flathead Valley, and a businessman in Columbia Falls, I would like to strongly express my support of the snowmobile trail grooming program. The recreational snowmobiling offerings of our area are of great financial benifit to our area's winter economy.

Recreational snowmobilers dollars create revenue to many of our customers as well as to our NAPA Auto Parts store in Columbia Falls. Many of our employees, customers, family, and friends enjoy snowmobile activities on the groomed trails of our area.

16-1

Thank You!
—Karl J. Skindingsrud
Work 892-4345
Home 892-7529

17

Meadow Lake
GOLF & SKI RESORT
100 St. Andrews Drive
Columbia Falls, MT 59912
(406) 892-7601

April 28, 1993

Bob Walker
Dept. of Fish, Wildlife & Parks
Helena, MT 59620

Dear Mr. Walker,

This letter is in support of the Flathead Valley snowmobiling issue.

Our company is a four-season year-round resort and is dependent upon this activity in the winter in generating "off-season" traffic. We have struggled the past few years in attracting guests to our area in the winter months. We are primarily a golf resort; however, due to the number of units available within our rental programs (84 in total for the '92-'93 winter season), we have an obligation to attract guests who find our winter recreational offerings inviting.

The past couple of years we have promoted our resort through the Columbia Falls Snowmobile Guide and the Montana Travel Guide. This year we realized occupancy percentages greater than we had anticipated. Not only did we have a few organized snowmobile groups stay with us (approximately 65 guests), we also offered a Meadow Lake hosted snowmobile tour for our resort guests, through Columbia Saw & Skidoo, which over a three month period involved approximately 58 people. Many of the people involved in our "hosted tour" had never experienced this type of activity, and some who enjoyed it so much rented sleds on their own at other times during their stay, hitting the trails on their own.

We have seen a sharp increase in interest for this recreational sport in the past couple of years. The funding to maintain our trails in this valley is essential as our economy, primarily dependent on a stagnant timber industry, is struggling to stabilize itself. Strong winter recreational opportunities will attract people to our area, boosting the economy for: hoteliers, retail outlets, service establishments, etc.

17-1

Without proper funding to maintain our snowmobile trails, the burden will fall on local volunteers. Much of the current services offered in the winter are products of volunteerism; if the small amount of funding we currently receive is reduced or withdrawn, it is very possible that this particular recreational activity will become a "way of the past". The local sportman may continue to "blaze his/her own trail"; however, the tourism base will be negated.

As an employer dependent upon strong year-round recreational opportunities, we would please request that you and your committee review in depth the possible effects of your decisions before they are finalized. Our valley needs your support in this endeavor.

17-1

Thank you for your time and consideration.

Sincerely,

MEADOW LAKE DEVELOPMENT CORP.

Barbara M. Riley

Barbara M. Riley
Resort Manager

/bmr

18

April 24, 1993

General comments to MDFW&P PEIS

Submitted by Bob Pallett, 416 Circle Drive, Cut Bank, MT 59427

It is quite astounding to read every word of a nearly 200 page OBJECTIVE document on environmental impacts of a national recreation program and find only one page of positive comments which turns out to be measured in monetary returns only.

Surely there must be SOMETHING positive about the sport if 2.5 million recreationalists nationally engage in the pastime at great personal expense of energy and monetary considerations.

I would suggest that some of the following 'impacts' be considered by the author:

- Trail counts show that 100,000 plus people have FUN riding snowmobiles in Montana annually.
- Snowmobiling promotes FAMILY fun and entertainment.
- Snowmobiles provided many HANDICAPPED persons a chance to enjoy the winter outdoors and aesthetic values that they would otherwise be unable to enjoy.
- Snowmobiles provide the ELDERLY with access to the back country they would otherwise be unable to enjoy.
- Snowmobiles provide winter TRANSPORTATION for biologists, meteorologists, park rangers, and a host of other agency and other business organizations. (MPC/SS)
- Snowmobiling provides more than $50,000 to CHARITY in Montana on an annual basis. (MS/Easter Seals/etc)
- Snowmobiling provides for INTRASTATE tourism as well as interstate/provincial tourism.
- Snowmobiles provide for the least PRESSURE in psi of any over the snow transportation.
- Snowmobiles provide for RESCUE transportation of all the public that may be in a hazardous winter situation.
- Snowmobiles provide for an avenue for FEEDING wildlife in emergency situations or on a regular basis.
- Snowmobiles provide a LOW PROFILE to wintering animals and thus reduce the stress on the animal compared to the upright figure. (Yellowstone Park Study)
- Snowmobile Clubs sponsor CPR/FIRST AID courses at their own expense for everyone in their community on a near state wide basis
- Snowmobile manufacturers now produce EFI motors that are very efficient and reduce air pollution.
- Snowmobile Clubs promote LEGISLATIVE safety laws for all types of recreation, not just snowmobiling at their own expense.
- Snowmobiles have made winters SAFER for everyone.

Plus:
1) [illegible] for legal relief
2) Snowmobiles do not [illegible] [illegible] any more than [illegible] [illegible] walkers.
3) Snowmobiles have access to [illegible] facilities [illegible] than other sports. [illegible]
4) Many Clubs provide [illegible] trail facilities
5) Snowmobilers 'pack it in - pack it out'
6) Snowmobilers help restore historic sites (cabins)
7) Snowmobiling provides outlets for children so they don't get into trouble on the streets
8) Snowmobile clubs provide warming huts for all users.
9) Snowmobilers build and plow lots for all users.

I would certainly believe that the above factors would mitigate in favor of the sport and should be considered in any PEIS of this magnitude, not just the negative impacts perceived by those who oppose the sport.

18-1

~~Bob Pallett~~
Bob Pallett

April 24, 1993

Response to MDFW&P Draft PEIS dated March 26, 1993

By Bob Pallett, as an individual; as a snowmobiler; as Past President of the Montana Snowmobile Association, Inc 1988-1992; and Past Director of the International Snowmobile Council 1988-1992 and member of the Advisory Committee. Bob Pallett

My concerns are listed by page and line numbers as follows:

p 2, line 1 'for any negative environmental consequences.'
This does not imply that any documentation is necessary for the determination of an environmental consequence. Therefore anyone for any reason may suggest any scenario using the 'could' word and have a valid argument under this assumption.

18-2

p 8, lines 1,2,3 'of the proper recreational uses ..... and environmental resources.'
This does not imply that which is proper recreational uses. Therefore anyone for any purpose of their choice may determine what is proper and have a valid argument under this scenario

p.9, lines 9,10 '...as an amendment to that plan ...'.
Inclusion of an amendment to a WMA plan takes away the management options of the Department. Populations and conditions vary widely on short notice. If the plan is amended for allowance of an activity, it must then be re-amended for disallowance. This seems self defeating in view of the purpose of this PEIS.

18-3

p 15, lines 4 through 15 'Under alternative ... the applicant'
It is true that Alternative 1 demands a limited amount of information from the applicant. It is also true that any other scenario such as Alternative 3 will demand a finite limited amount of information from the applicant. Current regulations meet all laws, rules, and regulations/procedures from all agencies involved. Show me one that doesn't. It is not the purpose of an PEIS to make rules and regulations. It is only to determine impacts on the environment. This whole section should be deleted and replaced to read 'All applicable current laws and regulations will be followed by all applicants.'

18-4

p.22, lines 18,19,20 '...'for temporary displacement .... use densities down in the short term.'
Expanded trails and linking systems will reduce trail densities in all scenarios, not just the short term.

18-5

* p 22, line 25 '...negative impacts of cold starts ...'
Snowmobiles by definition are over the snow vehicles. It is a scientific fact that to support snow requires reduced temperatures and 'cold weather'. The implication of this statement is that snowmobiling must take place in warm climates. That is like OSHA's statement that 'bovine feces, if fresh, 'could' be slippery if in the barnyard.'

p.23, line 10 '... unless existing roads are established.'
If the road is existing it is in place (Websters definition of existing.) To establish means to enact or build something that was previously non-existent. It seems to me the credibility of the document is questionable based on statements of conflicting facts just to fill up space in the document.

18-6

p.23, lines 30,31 'Trail maps ...... wet meadow areas.'
Snow packs that range from 50% to 200% of normal mandate that 'minimal snow cover and summer wet meadow areas' will vary significantly on an annual basis. Permanent designation of such areas defeats management objectives and is totally unrealistic. If controls of this sort are adopted then it should also be recommended that management be reduced equally since no further decisions will be necessary. Further, 'summer wet meadows' means what? July 22 through September 23? The term 'summertime' means many dates to many different people.

18-7

p. 25, lines 1 through 11
Not a single word was said for moving trailheads upward in elevation to accommodate snowmobilers as early and late high elevation riding becomes available. The only thing noted is additional restrictions on the sport.

18-8

p.28, line 30 '...March through May ....'
March should be changed to April 15 since bears den at and above 5500 feet. It is also noted that occasionally some bears emerge from their dens in all months of the 'hibernation' season for unknown reasons. It is unrealistic to attempt to impose regulations that covers EVERY potential possibility.

18-9

p28, line 30 'Signing would be required ....through sensitive areas....'
This document identifies 'sensitive soils, sensitive flora, sensitive fauna, and sensitive areas'. The requirement of signing 'sensitive' identified values will leave the trail with nothing but a series of signs for viewing not to mention the impacts on the environment due to the regulation.

p.26, lines 2,3 '... possible displacement ....away from the trails'.
Anything is possible. The statement to 'avoid the possible' is a generality that most certainly can be used by anyone for any reason and have a valid point. The author's use of the terms 'could, might, possible, may, and potential' is exceedingly vague and renders this document useless since under the above referred terms snowmobiling will be terminated.

18-10

* p.28, lines 14,18 ' '...avoid when possible ....recreation areas.'
A Wilderness boundary is so defined for each designated areas in the Congressional Record. There is no mention of 'buffer' zones. The avoidance of 'near' boundaries usurps the official Congressional Record. The law is clear. This section must be removed to conform with the legal powers and the idea of 'buffer' zones completely removed.

18-11

p.28, lines 20 through 30 'Hourly restrictions. ... trail maps.'
Hourly restrictions are determined by the land owners and managers as specified by State and Federal law. Hourly restrictions should not be a part of this document usurping laws that it cannot change.

18-12

* p.29, lines 32,33,38 'Trail maps .....with avoidance strategies....'.
This document requires that numerous items be identified on basic trail maps. Now this section requires that the strategies also be included on the map. Is this in any way reasonable in light of the voluminous information that would be required? The idea of expanded trail map requirements should be deleted entirely due to the complexity that is demanded by this document.

18-13

* p.29, line 29 '...areas of potential conflict ....'
Save Wilderness areas, there exists no place in the State of Montana that is without 'areas of potential conflict'. Is there anything wrong with 'documented or legally identified areas of conflict?

18-14

p.30, lines 15,17 'Trash receptacles, ... responsibilities.'
Land owners and managers determine the permission of trash receptacles. In the case of the USFS they are prohibited due to the resident bear population. This must be removed or otherwise reworded so as to not usurp the powers of the land owners. If it is not changed the diametrically opposite requirements will terminate snowmobiling in the area and perhaps this is the intent of the PEIS.

18-15

p.30, lines 18,19 'Enforcement, ... wilderness areas.'
Enforcement of designated roadless and wilderness areas is mandated by law to the managing agency or wilderness rangers. This section suggests usurping the above named powers or enforcement of the 'self identified' buffer zones proposed in the PEIS. State enforcement has no authority other than that which may be granted by the land management agency or State Legislature and should not be addressed in the PEIS.

18-16

p.30, line 28 '.... impacts of elevated noise levels on humans and animals.' and p.69, Table 4-1
Cited references in the bibliography use information dated between 1972 and 1978, publications well out of date with 1993 on the door step. The PEIS successful bidder cited no information from the industry on recent modifications and improvements in noise and pollution level control. Also no recent studies that are five years or less old cited with regard to human and animal impacts by modern machines. Suggesting that any impact exists based on outdated or non-existent material is pure speculation and casts reasonable doubt upon the conclusion.

18-17

* p 30, lines 33,34,35 'Proposals would include ... of alternative routes.'
This section limits snowmobile trails from ridge lines, open meadows, and exposed slopes. Should these options be eliminated from consideration as noted in the PEIS, then only existing roadways and heavily forested areas are available for trail construction. Current practice by land management agencies avoids grading and timber cutting if at all possible. This is indeed the death knell of snowmobiling on any new or different trails in Montana. 18-18

p.34, lines 8 through 11 'Administration .... for other program aspects.' and p.69, lines 5 through 17
The increased funding and personnel demanded in this PEIS is at the expense of currently funded programs. The $17,000 noted on page 69 is the equivalent of not funding the King's Hill project or alternately the Missoula project. This action directly elevates the level of government for its self perpetuation while decreasing the level of participation of the private snowmobiling citizen. This proposed action also directly seizes funds earmarked by the State Legislature as a tax refund on gasoline that is purchased by the snowmobiler for off highway use in favor of an elevated level of government personnel. It clearly appears that one of the chief aims of the PEIS is to decrease the snowmobile program in favor of government and not the environment whatsoever. If this is to be despite objections of those paying the cargo bill, then it should be phased in over time as monies become available without penalizing the 16 year old program in terms of reasonable growth and continuation of the current program. The $17,000 figure is certainly in question since the PEIS assumes the hiring of 1.5 additional FTE to accomplish its goals not to mention the additional law enforcement, rebuilt maps with a multitutde of information required, and placing signs on the trail at very short intervals. 18-19

* p.37, line 20 '...extremely steep slopes (over 60%) ...'
Over 60% slope is in fact something more than a 35 degree angle. Almost every recreational 4x4s including 6X6's are guaranteed to climb 65% slopes. This seems terribly restrictive for snowmobiles when in fact they climb steeper slopes than 60% over a sustained period of time and distance 18-20

p 39 lines 1 through 14 'Snow hydrology ... rate of melting.'
Line 2 cites the 'prevention of flood catastrophe' and line 11 cites 'external compaction can slow the ripening process' yet not one single word of benefit towards snowmobile compaction is noted as an aid to the prevention of flood catastrophe. Certainly this should mitigate favorably for the snowmobile. It should also be noted at this time or somewhere in the PEIS that snowmobiles and groomers exert less pressure on the surface than men, horse, skier, or almost any other over the snow specimen. 18-21

* p.60, line 26 '...could lead to extinction of .....'
Since the statement of extinction appears in the snowmobile PEIS it infers that snowmobiles are at least responsible in part for the extinction of the millions of species (99% of all known to exist species now gone). I believe this to be an unfair and unsubstantiated statement to appear in the snowmobile PEIS. 18-22

p 65, lines 28,29,30 'The establishment of .... before approving applications.'
The restructuring of the Review Committee now known as the Advisory Committee is quite unnecessary. The land managers are required to approve the project; the MDFW&P administrators are required to review the applications in light of all regulations and recommendations; and the Advisory Committee allocates the funds based upon knowledge of the project areas in question. The realignment of the committee will only serve to double government bureaucracy having multiple people doing the same one person job. I certainly object to the expansion of the committee that will lead to a very cumbersome process that works very poorly when many cooks are involved in the stew. 18-23

p 74, lines 24,25,26 'Disturbances in wet meadows .... is naturally low.'
I certainly question the claim that the biological productivity in wet meadows is naturally low. Quite contrarily, compared to climax forests the biodiversity and production is very high. Please point the error of my ways 18-24

p 78, lines 24,25 'Snowmobiling activities .... characteristics of watersheds. ...'
The sentence implies that snowmobile activities have the potential for changing the characteristics of a watershed. In Montana there exists three major watersheds, the Columbia, the Missouri, and the Hudson Bay. There is no area comparisons of 'potentially affected areas' caused by snowmobiles to the total area of the watersheds in question. I would think that it would be important to know the extent of the problem rather than submitting an opinion that has no scientific basis. I suspect that the area compacted by snow machines is indeed minute compared to the area of a watershed. 18-25

* p. 119 to 146- NEARLY 400 UNCITED BUT REFERENCED WORKS.
What possible good besides the expenditure of program money could 26 pages of references citing nearly 400 works be listed but completely ignored in the preparation of this PEIS? There certainly must be a motive somewhere to justify such an extravaganza with no meaning to the study. 18-26

* Uncited bibliographies:
I particularly object to the citing of "Anonymous" as an official portion of a PEIS. This is hearsay on the part of the preparers or anyone else.

19

April 28, 1993

Bob Walker
Statewide Trails Coordinator
Montana Department of Fish, Wildlife and Parks
1420 East Sixth Avenue
Helena, MT 59620

Re: Testimony
Programmatic EIS
Snowmobile Grant Program

Under proposed and preferred alternatives, past and present use of groomed snowmobile trails is being threatened by the arbitrary process that the DFWP proposes to use for the future management of the Snowmobile Grant Program. The process to be used would institute negative actions with no provision for public involvement or input. No process for public opinion or review is a significant and detrimental exclusion in this document. 19-1

The PEIS centers on mitigating for Grizzly Bear habitat with seasonal closures and restrictions but again is arbitrary by not providing specific mitigation measures to take place in proven occupied habitat only. This is in light of the fact that many areas have recovered bear populations that did not require such excessive measures in the past. 19-2

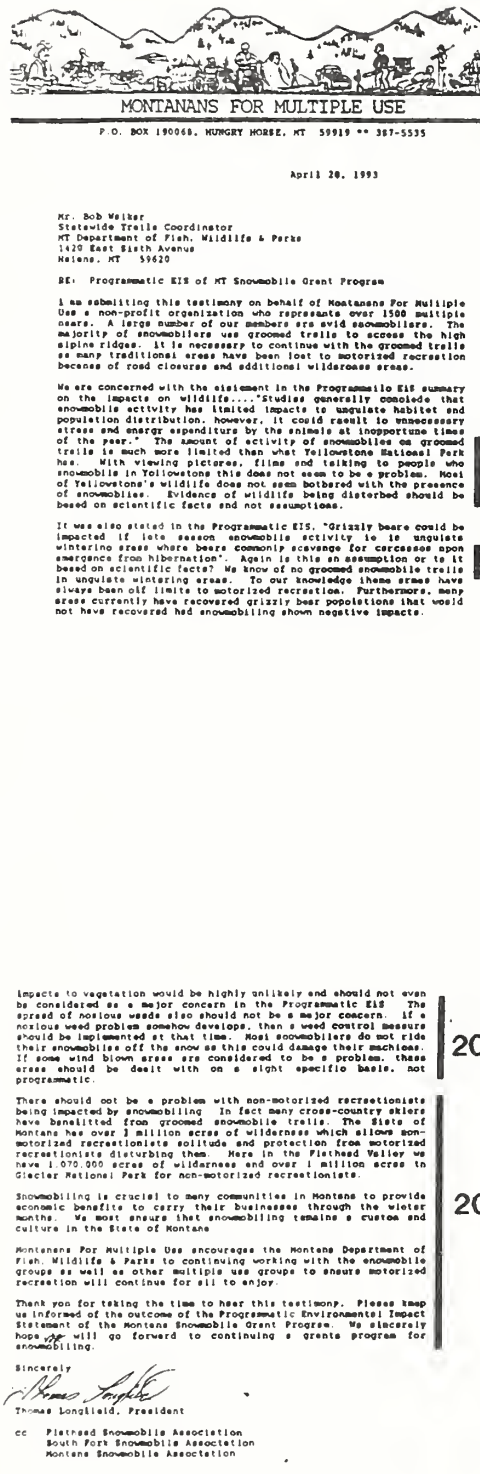
Negative mitigating actions also could include avoidance of off road play areas which could be claimed by non-motorized recreationists with no actual documentation of prior and exclusive use. The historical use by the snowmobiling public and the sometimes exclusive use by them could be disregarded by a document supporting a management process which centers on catering to the non-motorized public. This policy disregards the compatible and more popular use as proven by the number of snowmobile users in contrast to any other winter user group. Some of the areas used by snowmobilers could be classified as historical by the 30 plus years of use by the same. This use could also be defined as cultural because of historical use by families who utilized these areas for many years and the use became their culture.

Avoidance of areas with summer wetlands and/or alpine tundra with minimal snow cover leaves the door wide open to restrict access to many high alpine play areas. Without an indication as to what is acceptable snow cover to protect these areas, the PEIS is biased towards an open ended policy of restricting off road use by snowmobiling.

Proposed increases in management personnel to implement the changes proposed would unnecessarily burden the under funded program as more money is required to pay management overhead. With less money for on the ground costs of grooming, DFWP sets itself up as a nearly out of control bureaucracy that loses sight if its original intent and goals and sidesteps the public who chose them to manage and enhance the Grooming Program. This testimony is submitted on behalf of the Flathead Snowmobile Association and its 400 plus members. 19-3

Harvey D. Rejkofski Jr.
Harvey D. Rejkofski
Chairman, Public Lands
Flathead Snowmobile Assn.
15 Grace Rd
Columbia Falls, Mt. 59912

20



MONTANANS FOR MULTIPLE USE

P.O. BOX 190068, HUNGRY HORSE, MT 59919 ** 387-5535

April 20, 1993

Mr. Bob Walker
Statewide Trails Coordinator
MT Department of Fish, Wildlife & Parks
1420 East Sixth Avenue
Helena, MT 59620

RE: Programmatic EIS of MT Snowmobile Grant Program

I am submitting this testimony on behalf of Montanans For Multiple Use a non-profit organization who represents over 1500 multiple users. A large number of our members are avid snowmobilers. The majority of snowmobilers use groomed trails to access the high alpine ridges. It is necessary to continue with the groomed trails as many traditional areas have been lost to motorized recreation because of road closures and additional wilderness areas.

We are concerned with the statement in the Programmatic EIS summary on the impacts on wildlife...."Studies generally conclude that snowmobile activity has limited impacts to ungulate habitat and population distribution, however, it could result in unnecessary stress and energy expenditure by the animals at inopportune times of the year." The amount of activity of snowmobiles on groomed trails is much more limited than what Yellowstone National Park has. With viewing pictures, films and talking to people who snowmobile in Yellowstone this does not seem to be a problem. Most of Yellowstone's wildlife does not seem bothered with the presence of snowmobiles. Evidence of wildlife being disturbed should be based on scientific facts and not assumptions.

20-1

It was also stated in the Programmatic EIS, "Grizzly bears could be impacted if late season snowmobile activity is in ungulate wintering areas where bears commonly scavenge for carcasses upon emergence from hibernation". Again is this an assumption or is it based on scientific facts? We know of no groomed snowmobile trails in ungulate wintering areas. To our knowledge these areas have always been off limits to motorized recreation. Furthermore, many areas currently have recovered grizzly bear populations that would not have recovered had snowmobiling shown negative impacts.

20-2

Impacts to vegetation would be highly unlikely and should not even be considered as a major concern in the Programmatic EIS. The spread of noxious weeds also should not be a major concern. If a noxious weed problem somehow develops, then a weed control measure should be implemented at that time. Most snowmobilers do not ride their snowmobiles off the snow as this could damage their machines. If some wind blown areas are considered to be a problem, these areas should be dealt with on a sight specific basis, not programmatic.

20-3

There should not be a problem with non-motorized recreationists being impacted by snowmobiling. In fact many cross-country skiers have benefitted from groomed snowmobile trails. The State of Montana has over 3 million acres of wilderness which allows non-motorized recreationists solitude and protection from motorized recreationists disturbing them. Here in the Flathead Valley we have 1,070,000 acres of wilderness and over 1 million acres in Glacier National Park for non-motorized recreationists.

Snowmobiling is crucial to many communities in Montana to provide economic benefits to carry their businesses through the winter months. We must ensure that snowmobiling remains a custom and culture in the State of Montana.

Montanans For Multiple Use encourages the Montana Department of Fish, Wildlife & Parks to continuing working with the snowmobile groups as well as other multiple use groups to ensure motorized recreation will continue for all to enjoy.

Thank you for taking the time to hear this testimony. Please keep us informed of the outcome of the Programmatic Environmental Impact Statement of the Montana Snowmobile Grant Program. We sincerely hope we will go forward to continuing a grants program for snowmobiling.

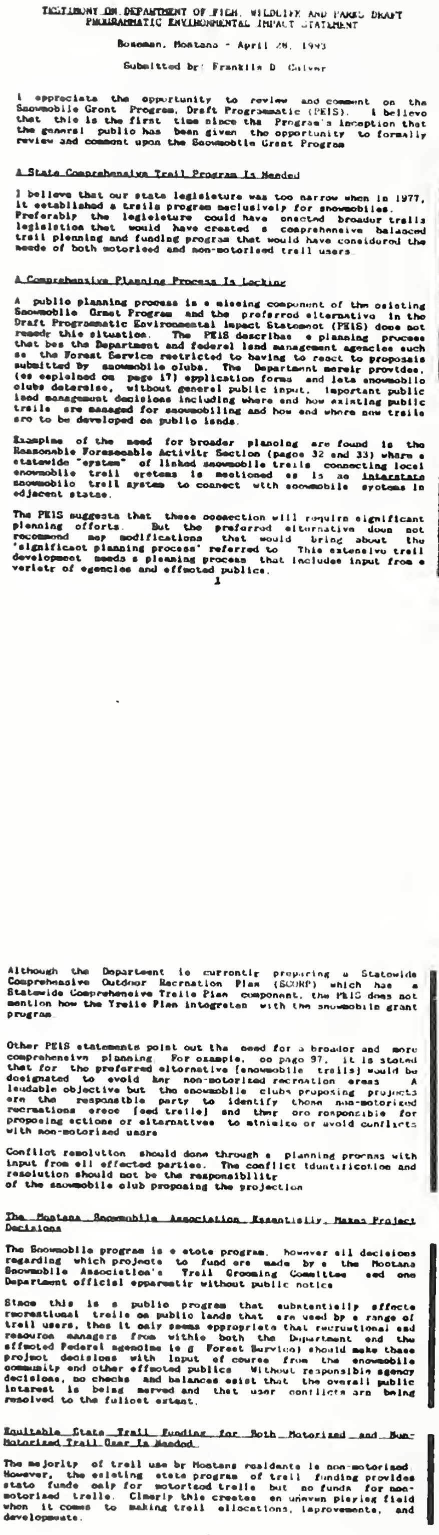
20-4

Sincerely

Thomas Longfield, President

cc Flathead Snowmobile Association
South Fork Snowmobile Association
Montana Snowmobile Association

21



TESTIMONY ON DEPARTMENT OF FISH, WILDLIFE AND PARKS DRAFT PROGRAMMATIC ENVIRONMENTAL IMPACT STATEMENT

Bozeman, Montana - April 28, 1993

Submitted by: Franklin D. Culver

I appreciate the opportunity to review and comment on the Snowmobile Grant Program, Draft Programmatic (PEIS). I believe that this is the first time since the Program's inception that the general public has been given the opportunity to formally review and comment upon the Snowmobile Grant Program.

A State Comprehensive Trail Program Is Needed

I believe that our state legislature was too narrow when in 1977, it established a trails program exclusively for snowmobiles. Preferably the legislature could have enacted broader trails legislation that would have created a comprehensive balanced trail planning and funding program that would have considered the needs of both motorized and non-motorized trail users.

A Comprehensive Planning Process Is Lacking

A public planning process is a missing component of the existing Snowmobile Grant Program and the preferred alternative in the Draft Programmatic Environmental Impact Statement (PEIS) does not remedy this situation. The PEIS describes a planning process that has the Department and federal land management agencies such as the Forest Service restricted to having to react to proposals submitted by snowmobile clubs. The Department merely provides, (as explained on page 17) application forms and lets snowmobile clubs determine, without general public input, important public land management decisions including where and how existing public trails are managed for snowmobiling and how and where new trails are to be developed on public lands.

Examples of the need for broader planning are found in the Reasonable Foreseeable Activity Section (pages 32 and 33) where a statewide "system" of linked snowmobile trails connecting local snowmobile trail systems is mentioned as is an interstate snowmobile trail system to connect with snowmobile systems in adjacent states.

The PEIS suggests that these connection will require significant planning efforts. But the preferred alternative does not recommend any modifications that would bring about the 'significant planning process' referred to. This extensive trail development needs a planning process that includes input from a variety of agencies and affected publics.

21-1

1

Although the Department is currently preparing a Statewide Comprehensive Outdoor Recreation Plan (SCORP) which has a Statewide Comprehensive Trails Plan component, the PEIS does not mention how the Trails Plan integrates with the snowmobile grant program.

Other PEIS statements point out the need for a broader and more comprehensive planning. For example, on page 97, it is stated that for the preferred alternative (snowmobile trails) would be designated to avoid key non-motorized recreation areas. A laudable objective but the snowmobile clubs proposing projects are the responsible party to identify those non-motorized recreations areas (and trails) and they are responsible for proposing actions or alternatives to minimize or avoid conflicts with non-motorized users.

Conflict resolution should done through a planning process with input from all affected parties. The conflict identification and resolution should not be the responsibility of the snowmobile club proposing the projection.

21-1

The Montana Snowmobile Association Essentially Makes Project Decisions

The Snowmobile program is a state program. however all decisions regarding which projects to fund are made by a the Montana Snowmobile Association's Trail Grooming Committee and one Department official apparently without public notice.

Since this is a public program that substantially affects recreational trails on public lands that are used by a range of trail users, then it only seems appropriate that recreational and resource managers from within both the Department and the affected Federal agencies (e.g. Forest Service) should make these project decisions with input of course from the snowmobile community and other affected publics. Without responsible agency decisions, no checks and balances exist that the overall public interest is being served and that user conflicts are being resolved to the fullest extent.

21-2

Equitable State Trail Funding for Both Motorized and Non-Motorized Trail User Is Needed

The majority of trail use by Montana residents is non-motorized. However, the existing state program of trail funding provides state funds only for motorized trails but no funds for non-motorized trails. Clearly this creates an uneven playing field when it comes to making trail allocations, improvements, and developments.

21-3

2

Although the funding issue is of major concern to non-motorized recreationist and was raised in the scoping process, an alternative that examined the need for equitable funding was dismissed as being out of the scope of the PEIS (see page 31). In my opinion an PEIS is an ideal tool for just such an examination. 21-4

Impacts On Other Trail Users Are Understated

The PEIS indicates (page 55) that during the recent scoping process that concerns were made related to overdevelopment from snowmobiling and the relationship between snowmobilers and other outdoor recreationist. These two issues were inadequately addressed in the PEIS.

With a continued source of state funds for designating, grooming and for constructing new snowmobile trails, then at some point in the future, lacking a coordinated trail planning process, the public lands could have an excess of snowmobile trails and a need for non-motorized trails. Without planning there are no mechanisms in place to assure that a balance of trails will be provided on public lands. 21-5

The experiences sought by non-motorized and motorized users are different and non-motorized users tend to avoid motorized areas and trails because of aesthetic and safety reasons. Therefore each time that an existing trail, road, or other area is designated, signed, groomed, or promoted for snowmobiles then non-motorized users are displaced. This important issue needs to be addressed in the PEIS and in project proposals. 21-6

Because of cut & fill trail construction and tree cutting wide enough to accommodate groomers, the impacts on non-motorized users by Snowmobile Program projects may not be limited to winter time snowmobile use but may also accumulative with increased motorized use during other times of year 21-7

22

Friends of the Bitterroot
P.O. Box 442
Hamilton, Montana 59840

April 29, 1993

Pat Graham, Director
Montana Department of Fish, Wildlife and Parks
1420 East Sixth Avenue
Helena, Montana 59620

Dear Mr. Graham,

This letter is in response to your April 1993 Draft Programmatic Environmental Impact Statement (DPEIS) for the Montana Snowmobile Grant Program.

The Friends of the Bitter Root sent a letter (dated September 21, 1993) listing the issues that we believe must be addressed in the Programmatic Environmental Impact Statement. The letter was sent to Mr. Bob Walker of your department and was in response to a scoping document that was distributed by the Montana Department of Fish, Wildlife and Parks. After reading the DPEIS, it is quite apparent that you almost totally ignored and/or redefined the issues that we raised in the letter. The DPEIS has other failings:

1. It lacks a reasonable range of alternatives. Only two "action" alternatives were considered (pp. i.v.), one of which is outside your authority (discontinuing the program within the Department) and therefore is not viable. Obviously only one legally viable alternative was developed. That does not qualify as rigorously exploring and objectively evaluating all reasonable alternatives as required by MEPA. Certainly a viable alternative would be one that is sensitive to wildlife needs, e.g. no grants funding to be used for trail grooming within, adjacent or leading to traditional wildlife winter ranges and other key wildlife habitat. Snowmobile areas would be designated to reduce the risk of wildlife harassment and would insure that snowmobile trail grooming and play areas are not located within, adjacent or leading to important wildlife habitat. 22-1

2. It fails to disclose the past, present and reasonably foreseeable future (10 year) impacts on elk and other wildlife species. Recent studies indicate that elk are adversely impacted by snowmobiling. Other studies have shown that increased human activity such as snowmobiling will displace elk and other wildlife species from their customary winter ranges. 22-2

3. It fails to disclose that the U.S. Forest Service or the Bureau of Land Management officials may lack the authority to "tier" a site specific project that is on federal land to a document prepared solely by personnel and/or agents of your department (pp. iii). We have evidence that as recent as late August 1992, Forest Service officials were unaware that you were preparing a DPEIS on the Montana Snowmobile Grants Program. 22-3

4. It fails to fully disclose areas in the State of Montana where funds from the state's grants program are being used to provide faster and easier access (groomed trails) to undeveloped/unroaded, and/or "inventoried" roadless areas on the national forests and national resource lands (BLM). This is a very controversial issue and one that should have been addressed in the DPEIS by developing an alternative which requires that snowmobile trail grooming financed with public funds (gas tax money) not be done within, adjacent or leading to unroaded and/or "inventoried" roadless areas on the national forests and national resource lands (BLM). 22-4

In the December 1992 issue of Grassroots for Multiple Use News, a small news sheet published by a local "Wise Use" group, Effie Kemp, an officer in the Ridge Runners Snowmobile Club, stated that "the first reason for re-organizing the club was to fight the wilderness issue." She went on to state that "Our members will lose four of their areas if any of the proposed Wilderness Bills are passed. The areas are Stoney Mountain, Sapphires, West Big Hole and the Great Burn." Our membership would like to believe that you as Director would not want to lead your department into this quagmire. However, in view of the DPEIS issued by you, that may be a wrong assumption. 22-5

In summary, we believe the DPEIS is legally insufficient and is basically a non-disclosure and non-informative document. Much of the material in the DPEIS appears to have been printed from what was already on the contractor's computer system word processor, slightly modified to fit the current subject and placed in the DPEIS text. The public deserves better. 22-6

Sincerely yours,

Donald K. Laughlin

Donald K. Laughlin

cc: Bob Walker, Statewide Trails Program Coordinator, DFWP
Montana Wilderness Association
American Wildlands
People for Elk
Alliance for the Wild Rockies

23

RECEIVED

Pat Graham
Director
Fish Wildlife & Parks
1420 East 6th Ave
Helena

29 April 93

Dear Mr Graham:

I am writing today to voice my disgust and alarm and anger at your proposed Snowmobile trail expansion plan.

3,000 miles of snowmobile trails are enough. $403,000 dollars spent on snowmobile trails is enough.

You have no business promoting the snowmobile business into wild lands, Wilderness study areas and Wildlife refuges. I am one of the 70% of Montanans who oppose further spread of Motorized Wreckreation. If people need a motor between them and the land there are 33,000 miles of Forest Roads open to Sunday drivers. 23-1

You have failed to consider the environmental impacts of expanded snowmobile use. Your agency spends not one dime on legitimate non-motorized trail use, yet non motorized trail use days outnumber motorized use by about 10 to 1. 23-2

Tom Kilmer
621 2nd Street
Helena Montana

Tom Kilmer
Montana Native

24

OVER SNOW ACCESS INC

P O Box 1356
Big Timber MT 59011-1356

RECEIVED

K.G. Thompson, Pres.
Big Timber MT

Steve Evans, Sec.
Big Timber MT

Willie Littell, Treas.
Big Timber MT

Directors

Vic Rue
McLeod MT

Dave Harvey
Bozeman, MT

Darrell Crabb
Cooke City, MT

Mike Dorse
Billings MT

Dave Reng
Billings MT

Randy [illegible]
Big Timber MT

Mark Stephens
Big Timber MT

Marty Lubin
Hamilton, MT

Ricky Sommers
Cooke City MT

Norman Vadseth
Martinsdale, MT

Jim Held
Clyde Park, MT

[illegible]
Hamilton, MT

TO: Bob Walker
Statewide Trails Program Coordinator
MT Dept of Fish, Wildlife & Parks
1420 E Sixth Av
Helena MT 59620

FROM: Over Snow Access, Inc.
P O Box 1356
Big Timber MT 59011

RE PEIS
Montana Snowmobile Grant Program

On behalf of the membership, I would like to take this opportunity to comment on the Draft Programmatic Environmental Impact Statement for the Montana Snowmobile Grant Program.

Over Snow Access, Inc., represents a diverse membership across Montana and several neighboring states. The association works with local communities to inform snowmobilers about the impacts land managers decisions may have on the sport of snowmobiling.

In order to keep this comment statement brief, I will not address each issue seperately, but will address the entire document as a whole. After looking through the document, I feel that it should have been more positive toward the sport of snowmobiling.

More emphasis should be put on the positive values of economics and family relationships. The long term effects of the positive values should outweigh the short term impacts, i.e. minimal air quality changes and minimal wildlife impact. 24-1

Since the funding is derived from snowmobile usage, all funding should remain for the use of promoting snowmobile trails and grooming. Any cooperative effort with other users should be positive to the snowmobile usage and not negatively impact snowmobiling in any way 24-2

I would recommend Alternative #3, with the provision that recommendations for granting funds be primarily from the local club/community and that they would be implemented for the positive good of snowmobiling in general.

Sincerely,

Charles Becken, President

25

Sweet Grass County Recreation Association
Big Timber, Montana 59011

TO: Bob Walker
Statewide Trails Program Coordinator
MT Dept of Fish, Wildlife & Parks
1420 E Sixth Av
Helena MT 59620

RECEIVED

FROM: Grooming Committee
Sweet Grass County Recreation Assn
Big Timber MT 59011

RE: PEIS
Montana Snowmobile Grant Program

We would like to take this opportunity to comment on the Draft Programmatic Environmental Impact Statement for the Montana Snowmobile Grant Program.

The Sweet Grass County Recreation Association (SGCRA) has been involved in the Snowmobile Grant Program since the beginning of the program. In fact, the association groomed its trails with local donations before the program was started and continues to use volunteers and local donations to improve the condition of the trails.

To keep this comment statement brief, we will not address each issue seperately, but will, instead, address the entire document as a whole. After examining the document closely, we feel that it should have been more positive toward the sport of snowmobiling. All impacts do not have to be necessarily negative.

Funds derived from the program should remain directed for grooming of snowmobile trails and immediately related efforts. We do not feel that they should be used for studies or improvements for other trail uses unless the other users contribute funds and the trail remains open to snowmobiling as a primary use. 25-1

The value of the program to the local communities should be a PRIMARY POSITIVE IMPACT. Local communities in Montana are small and generally need all the winter income available to survive. The recommendations from the local club/community leaders should remain a positive source of input in directing the use of funds from the program. 25-2

The value of the program to the family should also be a PRIMARY POSITIVE IMPACT. Most snowmobilers are families spending weekend time together. This aspect needs to be strongly emphasized to bring back a sense of "family values". 25-3

In our community we have many young people starting to snowmobile. While they cannot afford the new, more expensive snowmobiles to start out, we feel it is very important that they be encouraged to participate. We feel the section in the PEIS dealing with outdated snowmobiles may discriminate against those who cannot afford new machines. 25-4

When addressing trail use, especially groomed snowmobile trails, conflicts between users should be historically and economically analyzed. Ex. A few skiers could effectively create a situation where many, many snowmobilers are impacted, creating a loss of revenue for the community. However, groomed snowmobile trails could become an extremely important avenue for other users as long as the trail remains primarily used for snowmobiles. A closer working relationship between users is recommended, again provided snowmobiling does not suffer any losses. 25-5

In conclusion, we recommend Alternative #3 with the understanding that the program continues to follow recommendations from the local communities

Willie Littell
Willie Littell, Chairman

Kevin Kunda
Kevin Kunda, Committee Member

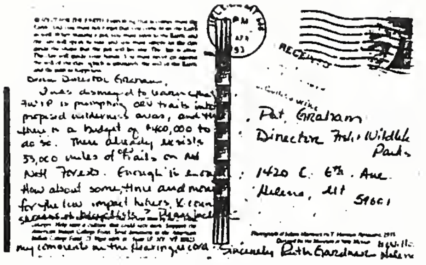
K. G. Thompson
K. G. Thompson, Committee Member

Jeff Boe
Jeff Boe, Committee Member

Bob Peterson
Bob Peterson, Committee Member

Rick Reed
Rick Reed, Committee Member

26



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Dear Director Graham,

I was dismayed to learn that FW&P is promoting OHV trails into proposed wilderness areas, and that there is a budget of $400,000 to do so. There already exists 53,000 miles of trails on Mt Natl Forests. Enough is enough! How about some time and money for the low impact hikers, & cross country ~~skiers and backpackers~~? Please include my comments in the hearing record.

Sincerely Ruth Gardner Helena

Pat Graham
Director Fish & Wildlife Parks
1420 E. 6th. Ave.
Helena, MT
59601

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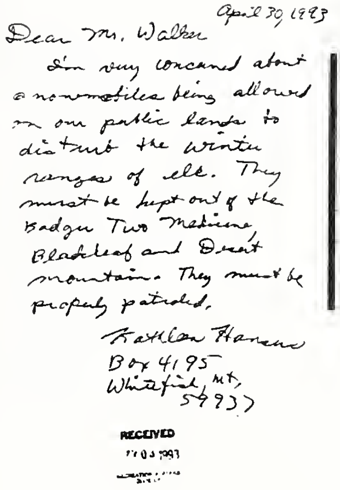
27



April 30, 1993

Dear Mr. Walker

I'm very concerned about snowmobiles being allowed on our public lands to disturb the winter ranges of elk. They must be kept out of the Badger Two Medicine, Blackleaf and Deart mountain. They must be properly patrolled,

Kathleen Hansen
Box 4195
Whitefish, MT,
59937

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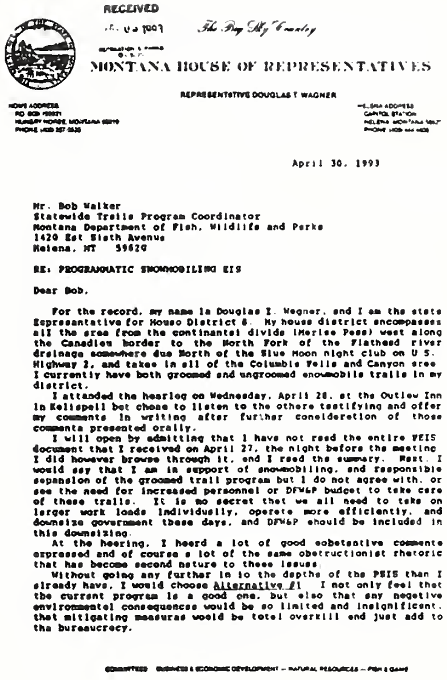
MAY 03 1993

27-1

28



RECEIVED
MAY 03 1993

The Big Sky Country

MONTANA HOUSE OF REPRESENTATIVES

REPRESENTATIVE DOUGLAS T. WAGNER

HOME ADDRESS
[illegible]

HELENA ADDRESS
CAPITOL STATION
HELENA, MONTANA [illegible]
PHONE [illegible]

April 30, 1993

Mr. Bob Walker
Statewide Trails Program Coordinator
Montana Department of Fish, Wildlife and Parks
1420 East Sixth Avenue
Helena, MT 59620

RE: PROGRAMMATIC SNOWMOBILING EIS

Dear Bob,

For the record, my name is Douglas T. Wagner, and I am the state Representative for House District 6. My house district encompasses all the area from the continental divide (Marias Pass) west along the Canadian border to the North Fork of the Flathead river drainage somewhere due North of the Blue Moon night club on U.S. Highway 2, and takes in all of the Columbia Falls and Canyon area. I currently have both groomed and ungroomed snowmobile trails in my district.

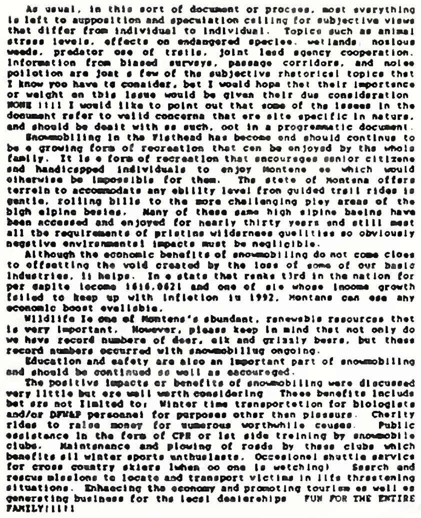
I attended the hearing on Wednesday, April 28, at the Outlaw Inn in Kalispell but chose to listen to the others testifying and offer my comments in writing after further consideration of those comments presented orally.

I will open by admitting that I have not read the entire PEIS document that I received on April 27, the night before the meeting. I did however browse through it, and I read the summary. Next, I would say that I am in support of snowmobiling, and responsible expansion of the groomed trail program but I do not agree with, or see the need for increased personnel or DFW&P budget to take care of these trails. It is no secret that we all need to take on larger work loads individually, operate more efficiently, and downsize government these days, and DFW&P should be included in this downsizing.

At the hearing, I heard a lot of good substantive comments expressed and of course a lot of the same obstructionist rhetoric that has become second nature to these issues.

Without going any further in to the depths of the PEIS than I already have, I would choose Alternative #1. I not only feel that the current program is a good one, but also that any negative environmental consequences would be so limited and insignificant, that mitigating measures would be total overkill and just add to the bureaucracy.

COMMITTEES: BUSINESS & ECONOMIC DEVELOPMENT — NATURAL RESOURCES — FISH & GAME



As usual, in this sort of document or process, most everything is left to supposition and speculation calling for subjective views that differ from individual to individual. Topics such as animal stress levels, effects on endangered species, wetlands, noxious weeds, predator use of trails, joint lead agency cooperation, information from biased surveys, passage corridors, and noise pollution are just a few of the subjective rhetorical topics that I know you have to consider, but I would hope that their importance or weight on this issue would be given their due consideration. NONE !!!! I would like to point out that some of the issues in the document refer to valid concerns that are site specific in nature, and should be dealt with as such, not in a programmatic document.

Snowmobiling in the Flathead has become and should continue to be a growing form of recreation that can be enjoyed by the whole family. It is a form of recreation that encourages senior citizens and handicapped individuals to enjoy Montana as which would otherwise be impossible for them. The state of Montana offers terrain to accommodate any ability level from guided trail rides in gentle, rolling hills to the more challenging play areas of the high alpine basins. Many of these same high alpine basins have been accessed and enjoyed for nearly thirty years and still meet all the requirements of pristine wilderness qualities so obviously negative environmental impacts must be negligible.

Although the economic benefits of snowmobiling do not come close to offsetting the void created by the loss of some of our basic industries, it helps. In a state that ranks 43rd in the nation for per capita income ($16,062) and one of six whose income growth failed to keep up with inflation in 1992, Montana can use any economic boost available.

Wildlife is one of Montana's abundant, renewable resources that is very important. However, please keep in mind that not only do we have record numbers of deer, elk and grizzly bears, but these record numbers occurred with snowmobiling ongoing.

Education and safety are also an important part of snowmobiling and should be continued as well as encouraged.

The positive impacts or benefits of snowmobiling were discussed very little but are well worth considering. These benefits include but are not limited to: Winter time transportation for biologists and/or DFW&P personnel for purposes other than pleasure. Charity rides to raise money for numerous worthwhile causes. Public assistance in the form of CPR or 1st aide training by snowmobile clubs. Maintenance and plowing of roads by these clubs which benefits all winter sports enthusiasts. Occasional shuttle service for cross country skiers (when no one is watching). Search and rescue missions to locate and transport victims in life threatening situations. Enhancing the economy and promoting tourism as well as generating business for the local dealerships. FUN FOR THE ENTIRE FAMILY!!!!!

28-1

In closing, I would again urge all agencies and departments whether they be state of federal, to use good, valid and hopefully current data whenever decisions that may impact the human environment are being considered. Please don't leave man out of the equation. Thank you for this opportunity to comment on the PEIS on snowmobiling and I would like copies of all the comments generated on this issue as well as the departments decision.

Sincerely,

Douglas T. Wagner

Rep. Douglas T. Wagner
House District 8

cc: Governor Marc Racicot
Montana Snowmobile Association
Flathead Snowmobile Association
South Fork Snowmobile Association
Oversnow Access
Gallatin Valley Snowmobile Association

29

Pat

BEVERLY MAGLEY
905 SOUTH ROONEY
HELENA MT 59601
(406) 443-7977

RECEIVED
APR 30 1993
DIRECTOR'S OFFICE

Pat Graham, Director
Montana Dept. Fish, Wildlife & Parks
1420 East Sixth Avenue
Helena, MT 59620

April 30, 1993

Mr. Graham,

Last night I attended the public meeting regarding the PEIS for the Snowmobile Grant Program, and wish to comment on a number of issues related to that project funded by your department.

The PEIS is inadequate and biased in a number of fundamental ways. Immediately apparent are the inadequate maps provided. There is no possible way a concerned Montanan can discern exactly where the proposed trails are located. 29-1 Hence, specific comments and evaluations are impossible. Additionally, few alternatives are presented -- specifically, alternatives that do NOT promote snowmobiling in sensitive areas. 29-2

According to your own department's data, only one in five winter recreationists use snowmobiles. Nevertheless, all automobile users contribute money, via the gas tax, to promote and maintain snowmobile recreation. Not one cent is spent by Fish, Wildlife & Parks to improve or maintain trails for four-fifths of the Montanans who prefer non-motorized winter recreation. 29-3

The fundamental inequity here is obvious and must be addressed. Snowmobiling is a game affordable to only the elite recreationist (basic costs for a machine are $1,500 to $9,500, plus a trailer, truck, and hitch. In contrast, ski and snowshoe costs begin under $100). The Department of Fish, Wildlife & Parks should re-evaluate their commitment to promoting fuel-intensive snowmobiling, particularly into sensitive areas, proposed wildernesses, and winter game ranges. 29-4

At a time when you are forced to close parks and reduce essential programs due to budget restraints, it seems short-sighted to promote ecologically unsound recreation that is used by a small minority of Montanans. The $403,000 per year (and rising) could be better distributed amongst trail users, in percentages that reflect actual trail use. According to your own data, NINE of every ten trail users is a non-motorized recreationist: horse-riders, hikers, cross-country skiers, bicyclists. Motorized users comprise a very small percentage of use by residents, yet receive 100 percent of department funding for trails. 29-5

Please reconsider departmental policy regarding the snowmobile grant program, as well as your continued funding of ORV trails and motorboat facilities. The inequity here must be addressed and remedied. You are the logical leader.

Thank you for the opportunity to comment.

30

April 29, 1993

Comments on the MDFW&P PEIS dated March 26, 1993.

Please add these comments to those that I presented at the hearing in Kalispell at the Outlaw Inn on April 26, 1993. These additional comments prepared by Bob Pellett, 416 Circle Drive, Cut Bank, MT 59427.

Comment 1: In reference to 'noise level impacts' addressed on pages 95, lines 23 through 38; page 96, lines 1 through 35; page 97, lines 3 through 16; and page 98, lines 7 through 27; and any other sections referring to 'noise'.

The information that has been cited to support the above indicated discussion is sadly out of date and does not reflect a true picture. New York State has not allowed the sale of any snowmobile with a dB-A rating greater than 73 since 1990. I have enclosed a handbook printed by the OFFICE OF PARKS, RECREATION, AND HISTORIC PRESERVATION, copyright 1992 as proof of my statements.

I believe that based on this document the industry and snowmobilers have in fact addressed the noise level issue and that modern machines are more quiet by very nearly a factor of four times of that which is cited in the bibliography. I also believe that the sections referring to noise in the draft PEIS should be modified and all alternatives should reflect a "no impact" statement in the final PEIS. 30-1

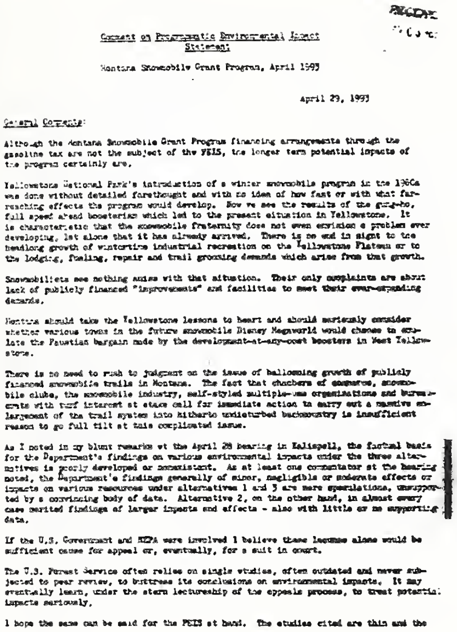
Comment 2: Referring to ALTERNATIVE 1 page 66, lines 20,21,22,23 and page 67, lines 1 through 19.

I strenuously object to the very poor usage of the English language in this section and it is characteristic of the entire document. In this section, seven sentences contain nine relative terms such as 'could, perceived, and potential' that leads to extreme redundancy. The meaning of the entire section is clouded by such vague usage of the language. It is noted that the person doing the editing is accomplished in 'English Studies'. I strongly recommend that a new editor be employed for the final version of the PEIS and that the extreme redundancy in the document be materially reduced. 30-2

Comment 3: I am very concerned that of all the issues raised none were determined as 'no impact'. It is nearly impossible to believe that any such successful program over a 16 year period would be totally wrong on every issue. Positive impacts should be weighed against the negative impacts to arrive at an impact decision. This document identified very few positive impacts. The reason for this is unclear to me but I would strongly urge the contractor to research and include the positive impacts as well. The simple listing of the positive and negative impacts should lead directly to an impact decision without a great deal of agony. 30-3

Comment 4: I wish to be on record as recognizing that all is not perfect with the snowmobile program. Certainly there is room for improvement in many of the issues addressed. I strongly support the MDFW&P, the PEIS effort, and Alternative 1 with endeavors to correct those inequities that are clearly unreasonable or in violation of current rules and regulations. I realize that this would require an Alternative 6 or a considerably modified Alternative 3. I would prefer a considerably modified Alternative 3. I cannot categorically accept Alternative 3 as presented in the Draft PEIS as no mitigating positive impacts were identified save those of jobs and money and it is written in very vague terms. 30-4

31



Comment on Programmatic Environmental Impact Statement

Montana Snowmobile Grant Program, April 1993

April 29, 1993

General Comments:

Although the Montana Snowmobile Grant Program financing arrangements through the gasoline tax are not the subject of the PEIS, the longer term potential impacts of the program certainly are.

Yellowstone National Park's introduction of a winter snowmobile program in the 1960s was done without detailed forethought and with no idea of how fast or with what far-reaching effects the program would develop. Now we see the results of the gung-ho, full speed ahead boosterism which led to the present situation in Yellowstone. It is characteristic that the snowmobile fraternity does not even envision a problem ever developing, let alone that it has already arrived. There is no end in sight to the headlong growth of wintertime industrial recreation on the Yellowstone Plateau or to the lodging, fueling, repair and trail grooming demands which arise from that growth.

Snowmobilists see nothing amiss with that situation. Their only complaints are about lack of publicly financed "improvements" and facilities to meet their ever-expanding demands.

Montana should take the Yellowstone lessons to heart and should seriously consider whether various towns in the future snowmobile Disney Megaworld would choose to emulate the Faustian bargain made by the development-at-any-cost boosters in West Yellowstone.

There is no need to rush to judgment on the issue of ballooning growth of publicly financed snowmobile trails in Montana. The fact that chambers of commerce, snowmobile clubs, the snowmobile industry, self-styled multiple-use organizations and bureaucrats with turf interest at stake call for immediate action to carry out a massive enlargement of the trail system into hitherto undisturbed backcountry is insufficient reason to go full tilt at this complicated issue.

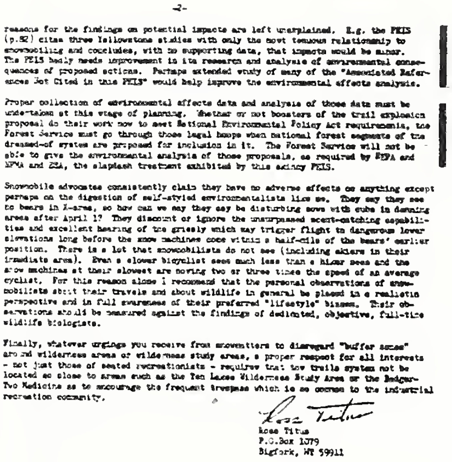
31-1

As I noted in my blunt remarks at the April 28 hearing in Kalispell, the factual basis for the Department's findings on various environmental impacts under the three alternatives is poorly developed or nonexistent. As at least one commentator at the hearing noted, the Department's findings generally of minor, negligible or moderate effects or impacts on various resources under alternatives 1 and 3 are mere speculations, unsupported by a convincing body of data. Alternative 2, on the other hand, in almost every case merited findings of larger impacts and effects - also with little or no supporting data.

If the U.S. Government and NEPA were involved I believe these lacunae alone would be sufficient cause for appeal or, eventually, for a suit in court.

The U.S. Forest Service often relies on single studies, often outdated and never subjected to peer review, to buttress its conclusions on environmental impacts. It may eventually learn, under the stern lectureship of the appeals process, to treat potential impacts seriously.

I hope the same can be said for the PEIS at hand. The studies cited are thin and the



-2-

31-2

reasons for the findings on potential impacts are left unexplained. E.g. the PEIS (p.52) cites three Yellowstone studies with only the most tenuous relationship to snowmobiling and concludes, with no supporting data, that impacts would be minor. The PEIS badly needs improvement in its research and analysis of environmental consequences of proposed actions. Perhaps extended study of many of the "Associated References Not Cited in this PEIS" would help improve the environmental effects analysis.

31-3

Proper collection of environmental affects data and analysis of those data must be undertaken at this stage of planning. Whether or not boosters of the trail explosion proposal do their work now to meet National Environmental Policy Act requirements, the Forest Service must go through those legal hoops when national forest segments of the dreamed-of system are proposed for inclusion in it. The Forest Service will not be able to give the environmental analysis of those proposals, as required by NEPA and NFMA and ESA, the slapdash treatment exhibited by this skinny PEIS.

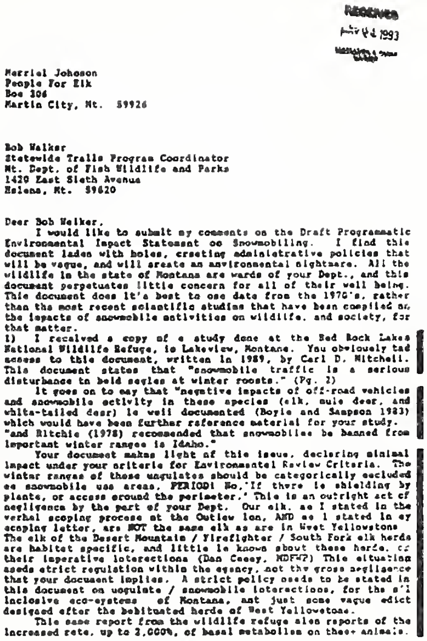
Snowmobile advocates consistently claim they have no adverse effects on anything except perhaps on the digestion of self-styled environmentalists like me. They say they see no bears in X-area, so how can we say they may be disturbing sows with cubs in denning areas after April 1? They discount or ignore the unsurpassed scent-catching capabilities and excellent hearing of the grizzly which may trigger flight to dangerous lower elevations long before the snow machines come within a half-mile of the bears' earlier position. There is a lot that snowmobilists do not see (including skiers in their immediate area). Even a slower bicyclist sees much less than a hiker sees and the snow machines at their slowest are moving two or three times the speed of an average cyclist. For this reason alone I recommend that the personal observations of snowmobilists about their travels and about wildlife in general be placed in a realistic perspective and in full awareness of their preferred "lifestyle" biases. Their observations should be measured against the findings of dedicated, objective, full-time wildlife biologists.

Finally, whatever urgings you receive from snowmobilers to disregard "buffer zones" around wilderness areas or wilderness study areas, a proper respect for all interests - not just those of seated recreationists - requires that the trails system not be located so close to areas such as the Ten Lakes Wilderness Study Area or the Badger-Two Medicine as to encourage the frequent trespass which is so common to the industrial recreation community.

Rose Titus

Rose Titus
P.O.Box 1379
Bigfork, MT 59911

32



RECEIVED
MAY 04 1993

Merriel Johnson
People For Elk
Box 306
Martin City, Mt. 59926

Bob Walker
Statewide Trails Program Coordinator
Mt. Dept. of Fish Wildlife and Parks
1420 East Sixth Avenue
Helena, Mt. 59620

Dear Bob Walker,

I would like to submit my comments on the Draft Programmatic Environmental Impact Statement on Snowmobiling. I find this document laden with holes, creating administrative policies that will be vague, and will create an environmental nightmare. All the wildlife in the state of Montana are wards of your Dept., and this document perpetuates little concern for all of their well being. This document does it's best to use data from the 1970's, rather than the most recent scientific studies that have been compiled on the impacts of snowmobile activities on wildlife, and society, for that matter.

32-1

1) I received a copy of a study done at the Red Rock Lakes National Wildlife Refuge, in Lakeview, Montana. You obviously had access to this document, written in 1989, by Carl D. Mitchell. This document states that "snowmobile traffic is a serious disturbance to bald eagles at winter roosts." (Pg. 2)

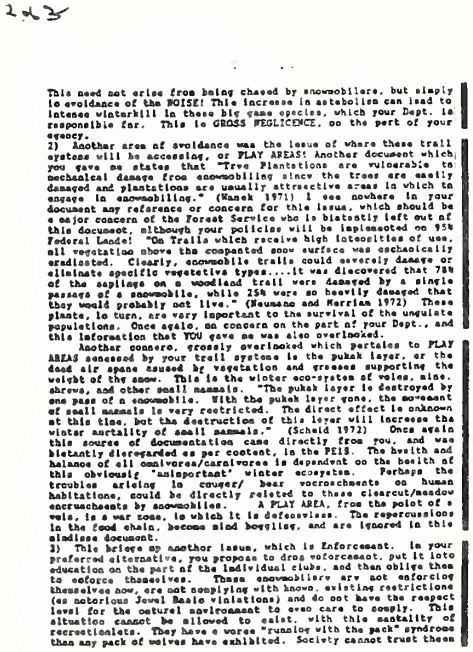
32-2

It goes on to say that "negative impacts of off-road vehicles and snowmobile activity in these species (elk, mule deer, and white-tailed deer) is well documented (Boyle and Sampson 1983) which would have been further reference material for your study. "and Ritchie (1978) recommended that snowmobiles be banned from important winter ranges in Idaho."

32-3

Your document makes light of this issue, declaring minimal impact under your criteria for Environmental Review Criteria. The winter ranges of these ungulates should be categorically excluded as snowmobile use areas, PERIOD! No,'If there is shielding by plants, or access around the perimeter.' This is an outright act of negligence by the part of your Dept. Our elk, as I stated in the verbal scoping process at the Outlaw Inn, AND as I stated in my scoping letter, are NOT the same elk as are in West Yellowstone The elk of the Desert Mountain / Firefighter / South Fork elk herds are habitat specific, and little is known about these herds, or their imperative interactions (Dan Casey, MDFWP) This situation needs strict regulation within the agency, not the gross negligence that your document implies. A strict policy needs to be stated in this document on ungulate / snowmobile interactions, for the all inclusive eco-systems of Montana, not just some vague edict designed after the habituated herds of West Yellowstone.

This same report from the wildlife refuge also reports of the increased rate, up to 2,000%, of basal metabolism on these animals.



2 & 3

32-4

This need not arise from being chased by snowmobilers, but simply in avoidance of the NOISE! This increase in metabolism can lead to intense winterkill in these big game species, which your Dept. is responsible for. This is GROSS NEGLIGENCE, on the part of your agency.

32-5

2) Another area of avoidance was the issue of where these trail systems will be accessing, or PLAY AREAS! Another document which you gave me states that "Tree Plantations are vulnerable to mechanical damage from snowmobiling since the trees are easily damaged and plantations are usually attractive areas in which to engage in snowmobiling." (Wanek 1971) I see nowhere in your document any reference or concern for this issue, which should be a major concern of the Forest Service who is blatantly left out of this document, although your policies will be implemented on 95% Federal Lands! "On Trails which receive high intensities of use, all vegetation above the compacted snow surface was mechanically eradicated. Clearly, snowmobile trails could severely damage or eliminate specific vegetative types....it was discovered that 78% of the saplings on a woodland trail were damaged by a single passage of a snowmobile, while 25% were so heavily damaged that they would probably not live." (Neumann and Merriam 1972) These plants, in turn, are very important to the survival of the ungulate populations. Once again, no concern on the part of your Dept., and this information that YOU gave me was also overlooked.

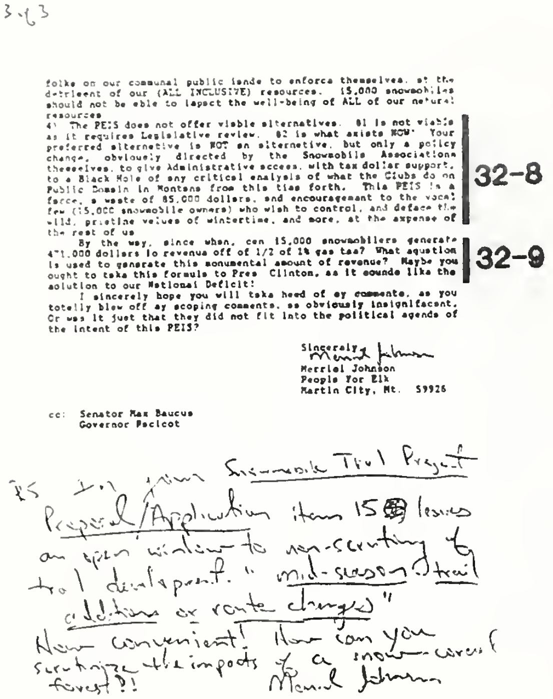
32-6

Another concern, grossly overlooked which pertains to PLAY AREAS accessed by your trail systems is the pukak layer, or the dead air space caused by vegetation and grasses supporting the weight of the snow. This is the winter eco-system of voles, mice, shrews, and other small mammals. "The pukak layer is destroyed by one pass of a snowmobile. With the pukak layer gone, the movement of small mammals is very restricted. The direct effect is unknown at this time, but the destruction of this layer will increase the winter mortality of small mammals." (Schmid 1972) Once again this source of documentation came directly from you, and was blatantly disregarded as per content, in the PEIS. The health and balance of all omnivores/carnivores is dependent on the health of this obviously 'unimportant' winter ecosystem. Perhaps the troubles arising in cougar/ bear encroachments on human habitations, could be directly related to these clearcut/meadow encroachments by snowmobiles. A PLAY AREA, from the point of a vole, is a war zone, in which it is defenseless. The repercussions in the food chain, become mind boggling, and are ignored in this mindless document.

32-7

3) This brings up another issue, which is Enforcement. In your preferred alternative, you propose to drop enforcement, put it into education on the part of the individual clubs, and then oblige them to enforce themselves. These snowmobilers are not enforcing themselves now, are not complying with known, existing restrictions (as notorious Jewel Basin violations) and do not have the respect level for the natural environment to even care to comply. This situation cannot be allowed to exist, with this mentality of recreationists. They have a worse "running with the pack" syndrome than any pack of wolves have exhibited. Society cannot trust them

3-63



folks on our communal public lands to enforce themselves, at the detriment of our (ALL INCLUSIVE) resources. 15,000 snowmobiles should not be able to impact the well-being of ALL of our natural resources.

4) The PEIS does not offer viable alternatives. #1 is not viable as it requires Legislative review. #2 is what exists NOW! Your preferred alternative is NOT an alternative, but only a policy change, obviously directed by the Snowmobile Associations themselves, to give Administrative access, with tax dollar support, to a Black Hole of any critical analysis of what the Clubs do on Public Domain in Montana from this time forth. This PEIS is a farce, a waste of 85,000 dollars, and encouragement to the vocal few (15,000 snowmobile owners) who wish to control, and deface the wild, pristine values of wintertime, and more, at the expense of the rest of us. **32-8**

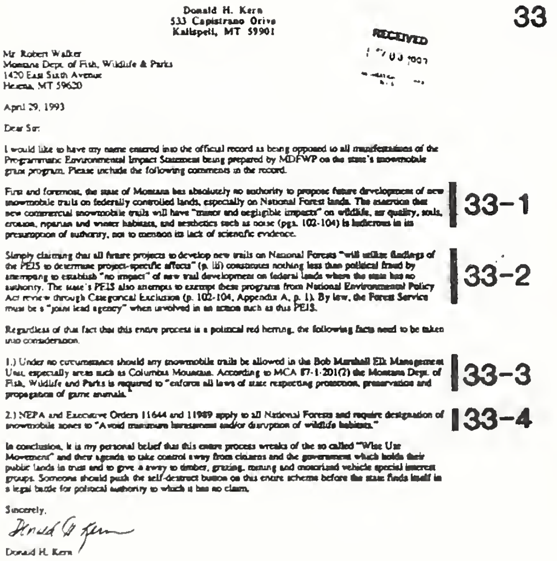
By the way, since when, can 15,000 snowmobilers generate 471,000 dollars in revenue off of 1/2 of 1% gas tax? What equation is used to generate this monumental amount of revenue? Maybe you ought to take this formula to Pres Clinton, as it sounds like the solution to our National Deficit! **32-9**

I sincerely hope you will take heed of my comments, as you totally blew off my scoping comments, as obviously insignificant. Or was it just that they did not fit into the political agenda of the intent of this PEIS?

Sincerely,
Merrel Johnson
Merriel Johnson
People For Elk
Martin City, Mt. 59926

cc: Senator Max Baucus
Governor Racicot

PS In your Snowmobile Trail Project Proposal/Application items 15 leaves an open window to non-scrutiny of trail development. "mid-season trail additions or route changes" How convenient! How can you scrutinize the impacts of a snow-covered forest?!
Merrel Johnson



33

Donald H. Kern
533 Capistrano Drive
Kalispell, MT 59901

RECEIVED
[illegible] 03 1993

Mr Robert Walker
Montana Dept. of Fish, Wildlife & Parks
1420 East Sixth Avenue
Helena, MT 59620

April 29, 1993

Dear Sir:

I would like to have my name entered into the official record as being opposed to all manifestations of the Programmatic Environmental Impact Statement being prepared by MDFWP on the state's snowmobile grant program. Please include the following comments in the record.

First and foremost, the state of Montana has absolutely no authority to propose future development of new snowmobile trails on federally controlled lands, especially on National Forest lands. The assertion that new commercial snowmobile trails will have "minor and negligible impacts" on wildlife, air quality, soils, erosion, riparian and winter habitats, and aesthetics such as noise (pgs. 102-104) is ludicrous in its presumption of authority, not to mention its lack of scientific evidence. **33-1**

Simply claiming that all future projects to develop new trails on National Forests "will utilize findings of the PEIS to determine project-specific affects" (p. iii) constitutes nothing less than political fraud by attempting to establish "no impact" of new trail development on federal lands where the state has no authority. The state's PEIS also attempts to exempt these programs from National Environmental Policy Act review through Categorical Exclusion (p. 102-104, Appendix A, p. 1). By law, the Forest Service must be a "joint lead agency" when involved in an action such as this PEIS. **33-2**

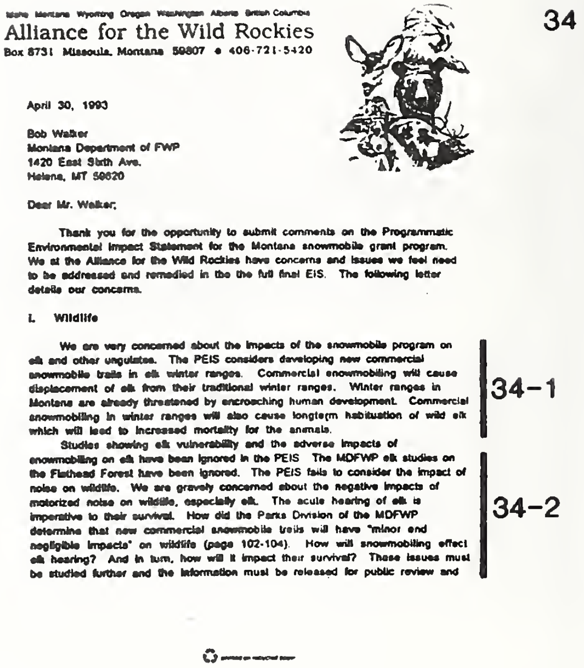
Regardless of the fact that this entire process is a political red herring, the following facts need to be taken into consideration.

1.) Under no circumstance should any snowmobile trails be allowed in the Bob Marshall Elk Management Unit, especially areas such as Columbia Mountain. According to MCA 87-1-201(2) the Montana Dept. of Fish, Wildlife and Parks is required to "enforce all laws of state respecting protection, preservation and propagation of game animals." **33-3**

2.) NEPA and Executive Orders 11644 and 11989 apply to all National Forests and require designation of snowmobile zones to "Avoid minimum harassment and/or disruption of wildlife habitats." **33-4**

In conclusion, it is my personal belief that this entire process wreaks of the so called "Wise Use Movement" and their agenda to take control away from citizens and the government which holds their public lands in trust and to give it away to timber, grazing, mining and motorized vehicle special interest groups. Someone should push the self-destruct button on this entire scheme before the state finds itself in a legal battle for political authority to which it has no claim.

Sincerely,
Donald H. Kern
Donald H. Kern



Idaho Montana Wyoming Oregon Washington Alberta British Columbia
Alliance for the Wild Rockies
Box 8731 Missoula, Montana 59807 • 406-721-5420

34

April 30, 1993

Bob Walker
Montana Department of FWP
1420 East Sixth Ave.
Helena, MT 59620

Dear Mr. Walker;

Thank you for the opportunity to submit comments on the Programmatic Environmental Impact Statement for the Montana snowmobile grant program. We at the Alliance for the Wild Rockies have concerns and issues we feel need to be addressed and remedied in the the full final EIS. The following letter details our concerns.

I. **Wildlife**

We are very concerned about the impacts of the snowmobile program on elk and other ungulates. The PEIS considers developing new commercial snowmobile trails in elk winter ranges. Commercial snowmobiling will cause displacement of elk from their traditional winter ranges. Winter ranges in Montana are already threatened by encroaching human development. Commercial snowmobiling in winter ranges will also cause longterm habituation of wild elk which will lead to increased mortality for the animals. **34-1**

Studies showing elk vulnerability and the adverse impacts of snowmobiling on elk have been ignored in the PEIS. The MDFWP elk studies on the Flathead Forest have been ignored. The PEIS fails to consider the impact of noise on wildlife. We are gravely concerned about the negative impacts of motorized noise on wildlife, especially elk. The acute hearing of elk is imperative to their survival. How did the Parks Division of the MDFWP determine that new commercial snowmobile trails will have "minor and negligible impacts" on wildlife (page 102-104). How will snowmobiling effect elk hearing? And in turn, how will it impact their survival? These issues must be studied further and the information must be released for public review and **34-2**

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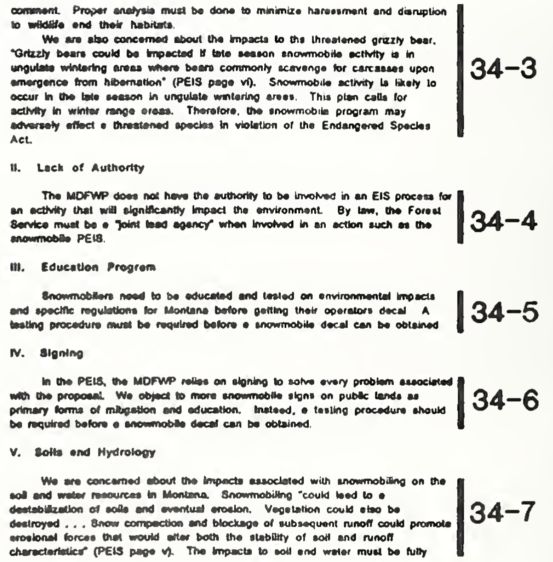


comment. Proper analysis must be done to minimize harassment and disruption to wildlife and their habitats.

We are also concerned about the impacts to the threatened grizzly bear. "Grizzly bears could be impacted if late season snowmobile activity is in ungulate wintering areas where bears commonly scavenge for carcasses upon emergence from hibernation" (PEIS page vi). Snowmobile activity is likely to occur in the late season in ungulate wintering areas. This plan calls for activity in winter range areas. Therefore, the snowmobile program may adversely affect a threatened species in violation of the Endangered Species Act. **34-3**

II. **Lack of Authority**

The MDFWP does not have the authority to be involved in an EIS process for an activity that will significantly impact the environment. By law, the Forest Service must be a "joint lead agency" when involved in an action such as the snowmobile PEIS. **34-4**

III. **Education Program**

Snowmobilers need to be educated and tested on environmental impacts and specific regulations for Montana before getting their operators decal. A testing procedure must be required before a snowmobile decal can be obtained. **34-5**

IV. **Signing**

In the PEIS, the MDFWP relies on signing to solve every problem associated with the proposal. We object to more snowmobile signs on public lands as primary forms of mitigation and education. Instead, a testing procedure should be required before a snowmobile decal can be obtained. **34-6**

V. **Soils and Hydrology**

We are concerned about the impacts associated with snowmobiling on the soil and water resources in Montana. Snowmobiling "could lead to a destabilization of soils and eventual erosion. Vegetation could also be destroyed . . . Snow compaction and blockage of subsequent runoff could promote erosional forces that would alter both the stability of soil and runoff characteristics" (PEIS page v). The impacts to soil and water must be fully **34-7** analyzed and disclosed. The PEIS as it stands is completely inadequate.

VI. Roadless Areas

The PEIS fails to fully disclose areas in the state of Montana where funds from the state's grants program are being used to provide access into roadless areas on the National Forests and BLM lands. The roadless area issue is very controversial and must be addressed; it should have been addressed in the PEIS. An alternative should have been developed which requires that snowmobile trail grooming financed with public funds (gas tax money) not be done within, adjacent or leading into roadless areas. This issue is very important considering that all roadless areas in Montana are considered for Wilderness designation in the Northern Rockies Ecosystem Protection Act (NREPA). This proposal was introduced in 1992 and is scheduled to be reintroduced any day now in 1993. It is highly inappropriate to usurp to prerogative of the United States Congress. 34-8

Conclusion

We at the Alliance for the Wild Rockies have many concerns and issues which need to be resolved regarding the Montana snowmobile grant program. The above issues are no meant to be totally exhaustive in that we expect public land agencies to make wise decisions about resources not mentioned in this letter. We object to the PEIS as it stands and would like to be involved in going over more detailed and analytical documents. Please keep us informed by mailing us any information.

Sincerely,

Angie Coffin
AWR Ecosystem Defense

35

RECEIVED

183 Fairmont Rd.
Kalispell, MT 599
Apr. 29, 1993

MT. Dept. of Fish, Wildlife, + Parks
Attn: Bob Walker, Statewide Trails Program director
1420 E. Sixth Ave
Helena, MT 59620

Dear Mr. Walker:

Please enter the following comments into the record concerning the Snowmobile Programmatic DEIS for the State of Montana.

We support Alternative #1 — maintaining the program as it is. The program is working well. We care about the lands we ride on, but the implication is that wildlife and environmental concerns will not be taken into account unless they are spelled out for us, as in Alternative #3. The changes in Alternative 3 are well-intentioned, but environmental extremists in this area will look for, or create, any crack of opportunity to stop the program entirely. #3 is too arbitrary. 35-1

From a business standpoint, businesses in the Flathead Valley are on shifting sand. The resource base of our economy is being eroded by environmental extremism. Tourism was touted as the panacea for our economy and the environment. Now, as businesses struggle to adjust, the environmental faction is again shoveling away at the area's economy. 35-2

Snowmobilers and wildlife generally do not ~~[illegible]~~ conflict because animals (ungulates) are not in the high alpine snow areas where snowmobilers are. Seasonal road closures are already in place to minimize the impacts upon grizzlies in the spring. Those who testified against the program in Kalispell seemed to be fabricating every "what if" situation they could imagine — situations that can be addressed in a common sense manner if they occur.

Snowmobiling is a wholesome sport the whole family, including handicapped, can enjoy. The snowmobile is also a winter workhorse for Search and Rescue, Federal and State agencies, etc. Technology has made it a quieter, cleaner, safer machine than the first machines used decades ago. 35-2

The authority to use trails is a custom and culture that is being reinforced by tourists who come to Montana to snowmobile. It is a great way to see Montana with limited time — an afternoon of enjoyment touring Montana's backcountry.

Thank you for your time and consideration.

Sincerely,

Joe & Sheila Keller

36

NORTH FORK PRESERVATION ASSOCIATION

P. O. Box 4 Polebridge, MT 59928

April 30, 1993

RECEIVED
03 1993

Bob Walker
MDFWP
Helena, MT 59620

Dear Bob,

Before the Montana Department of Fish, Wildlife and Parks spends money on new snowmobile trails, MDFWP should be certain of not harassing elk and other wildlife with these trails. The money might be more wisely spent on snowmobile education and enforcement.

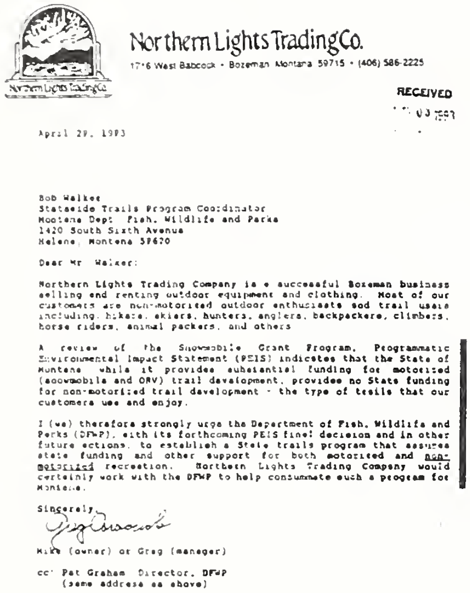
I have a snowmobile and I like it. However, I don't think new snowmobile trails are the proper business of Fish, Wildlife and Parks. 36-1

Sincerely,

President, NFPA

A nonprofit corporation dedicated to preserving the integrity of the North Fork of the Flathead Valley on the western edge of Waterton/Glacier International Peace Park

37



Northern Lights Trading Co.
1716 West Babcock • Bozeman Montana 59715 • (406) 586-2225

RECEIVED
03 1993

April 29, 1993

Bob Walker
Statewide Trails Program Coordinator
Montana Dept. Fish, Wildlife and Parks
1420 South Sixth Avenue
Helena, Montana 59620

Dear Mr. Walker:

Northern Lights Trading Company is a successful Bozeman business selling and renting outdoor equipment and clothing. Most of our customers are non-motorized outdoor enthusiasts and trail users including hikers, skiers, hunters, anglers, backpackers, climbers, horse riders, animal packers, and others.

37-1

A review of the Snowmobile Grant Program, Programmatic Environmental Impact Statement (PEIS) indicates that the State of Montana while it provides substantial funding for motorized (snowmobile and ORV) trail development, provides no State funding for non-motorized trail development - the type of trails that our customers use and enjoy.

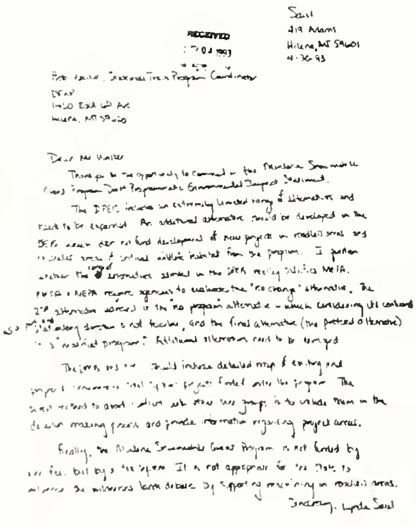
I (we) therefore strongly urge the Department of Fish, Wildlife and Parks (DFWP), with its forthcoming PEIS final decision and in other future actions, to establish a State trails program that assures state funding and other support for both motorized and non-motorized recreation. Northern Lights Trading Company would certainly work with the DFWP to help consummate such a program for Montana.

Sincerely,

Mike (owner) or Greg (manager)

cc: Pat Graham, Director, DFWP
(same address as above)

38



Saul
419 Adams
Helena, MT 59601
4-30-93

RECEIVED
03 1993

Bob Walker, Statewide Trails Program Coordinator
DFWP
1420 East 6th Ave
Helena, MT 59620

38-1

Dear Mr Walker

Thank you for the opportunity to comment on the Montana Snowmobile Grant Program Draft Programmatic Environmental Impact Statement.

The DPEIS includes an extremely limited range of alternatives and needs to be expanded. An additional alternative should be developed in the DPEIS which does not fund development of new projects in roadless areas and excludes areas of critical wildlife habitat from the program. I question whether the range of alternatives studied in the DPEIS really satisfies MEPA. MEPA & NEPA require agencies to evaluate the "no change" alternative. The 2nd alternative offered is the "no program" alternative – which considering the continued statutory direction is not feasible, and the final alternative (the preferred alternative) is a "modified program." Additional alternatives need to be developed.

38-2

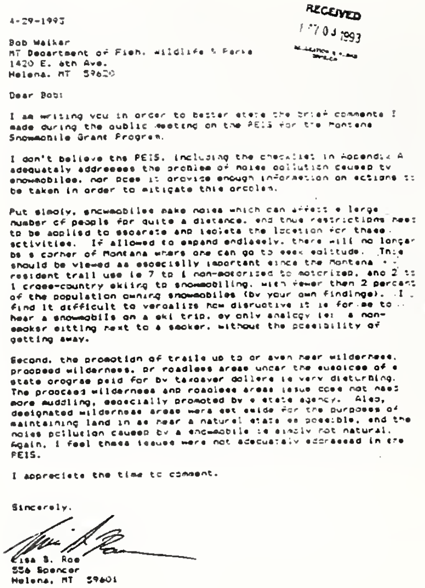
The DPEIS and FPEIS should include detailed maps of existing and proposed snowmobile trail systems projects funded under the program. The best method to avoid conflicts with other user groups is to include them in the decision making process and provide information regarding project areas.

38-3

Finally, the Montana Snowmobile Grant Program is not funded by user fees, but by a tax system. It is not appropriate for the State to influence the wilderness/roadless debate by supporting snowmobiling in roadless areas.

Sincerely, Lynda Saul

39



4-29-1993

RECEIVED
MAY 03 1993

Bob Walker
MT Department of Fish, Wildlife & Parks
1420 E. 6th Ave.
Helena, MT 59620

Dear Bob:

I am writing you in order to better state the brief comments I made during the public meeting on the PEIS for the Montana Snowmobile Grant Program.

39-1

I don't believe the PEIS, including the checklist in Appendix A adequately addresses the problem of noise pollution caused by snowmobiles, nor does it provide enough information on actions to be taken in order to mitigate this problem.

Put simply, snowmobiles make noise which can affect a large number of people for quite a distance, and thus restrictions need to be applied to separate and isolate the location for these activities. If allowed to expand endlessly, there will no longer be a corner of Montana where one can go to seek solitude. This should be viewed as especially important since the Montana resident trail use is 7 to 1 non-motorized to motorized, and 2 to 1 cross-country skiing to snowmobiling, with fewer than 2 percent of the population owning snowmobiles (by your own findings). I find it difficult to verbalize how disruptive it is for me to hear a snowmobile on a ski trip, my only analogy is: a non-smoker sitting next to a smoker, without the possibility of getting away.

39-2

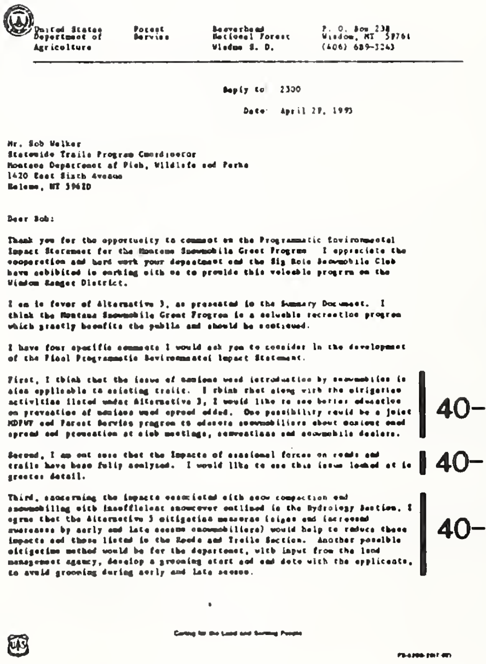
Second, the promotion of trails up to or even near wilderness, proposed wilderness, or roadless areas under the auspices of a state program paid for by taxpayer dollars is very disturbing. The proposed wilderness and roadless areas issue does not need more muddling, especially promoted by a state agency. Also, designated wilderness areas were set aside for the purposes of maintaining land in as near a natural state as possible, and the noise pollution caused by a snowmobile is simply not natural. Again, I feel these issues were not adequately addressed in the PEIS.

I appreciate the time to comment.

Sincerely,

Lisa B. Roe
556 Spencer
Helena, MT 59601

40



United States Department of Agriculture
Forest Service
Beaverhead National Forest
Wisdom R. D.
P. O. Box 238
Wisdom, MT 59761
(406) 689-3243

Reply to: 2300

Date: April 29, 1993

Mr. Bob Walker
Statewide Trails Program Coordinator
Montana Department of Fish, Wildlife and Parks
1420 East Sixth Avenue
Helena, MT 59620

Dear Bob:

Thank you for the opportunity to comment on the Programmatic Environmental Impact Statement for the Montana Snowmobile Grant Program. I appreciate the cooperation and hard work your department and the Big Hole Snowmobile Club have exhibited in working with us to provide this valuable program on the Wisdom Ranger District.

I am in favor of Alternative 3, as presented in the Summary Document. I think the Montana Snowmobile Grant Program is a valuable recreation program which greatly benefits the public and should be continued.

I have four specific comments I would ask you to consider in the development of the Final Programmatic Environmental Impact Statement.

First, I think that the issue of noxious weed introduction by snowmobiles is also applicable to existing trails. I think that along with the mitigation activities listed under Alternative 3, I would like to see better education on prevention of noxious weed spread added. One possibility would be a joint MDFWP and Forest Service program to educate snowmobilers about noxious weed spread and prevention at club meetings, conventions and snowmobile dealers. 40-1

Second, I am not sure that the impacts of seasonal forces on roads and trails have been fully analyzed. I would like to see this issue looked at in greater detail. 40-2

Third, concerning the impacts associated with snow compaction and snowmobiling with insufficient snowcover outlined in the Hydrology Section, I agree that the Alternative 3 mitigation measures (signs and increased awareness by early and late season snowmobilers) would help to reduce these impacts and those listed in the Roads and Trails Section. Another possible mitigation method would be for the department, with input from the land management agency, develop a grooming start and end date with the applicants, to avoid grooming during early and late season. 40-3

Caring for the Land and Serving People

[illegible]

Fourth, while I saw that the level of safety along snowmobile trails was listed under Issue 8, I did not see any discussion of the effects of the alternatives on this issue in the Summary Document. A big part of this issue, which I feel needs addressed, is how safe are the trails, in relation to the speeds which the newer snowmobiles can obtain. It seems that alternative 3 would provide an opportunity for applicants, MDFWP and the Forest Service to continue to work together to identify ways to keep snowmobilers' speeds from becoming hazardous to themselves as well as others, and to provide better safety signing and awareness programs for snowmobilers. 40-4

Again, I appreciate the opportunity to comment and I look forward the continuing cooperation in this program which provides such an important recreation opportunity to the snowmobiling public.

Sincerely,

Dennis

DENNIS RAVIC
District Ranger

41

Montana Wilderness Association
Northwest Field Office

April 28 1993

Bob Walker
Statewide Trails Program Coordinator MDFWP
1420 E Sixth Ave
Helena MT 59620

Dear Mr Walker

The last table in the Draft PEIS for the snowmobile grant program reveals the true purpose of this exercise - Show that major adverse impacts will occur if we don't keep the program going and show that expansion of the existing program will have negligible impact on any given issue. The list of what's left out of the draft reinforces the perception that this is simply an exercise in bureaucratic self-justification.

Most glaring in the draft PEIS is the section on perceptions of snowmobile program. The section suggests that everyone the department bothered to ask, loves snowmobiles and the state's program. However, a recent random survey of 2,000 Montanans commissioned by the U.S. Forest Service suggests otherwise. It should be noted that this survey is the largest random, statewide survey in recent Montana history on resource and forest issues. The survey by A&A Research of Kalispell found that 70 percent of Montanans disagree with making more areas available for motorized recreation. And for most of the forests surveyed, the vast majority of those said they strongly disagree. This result doesn't pertain to expanded snowmobile trail grooming per se, but it does indicate public attitudes about loud, fast moving machines in the backcountry. To 70 percent of Montanans, the snowmobile program is not as benign as this PEIS suggests. 41-1

I have no problem with managing part of the forest aside for snowmobile trails. What angers me, however, is the attitude by some snowmobilers that they have a right to race their machines in every non-wilderness drainage and that anyone who disagrees is trampling on their rights. A majority of the public does not use motorized backcountry vehicles, and most folks prefer peace and quiet when they're in the backcountry. It can be both aggravating and scary when you're cross-country skiing on an old roadbed and a band of snowmobiles roar past at 40-60 miles per hour. It also is aggravating that these self-proclaimed multiple-users in the Flathead say they're not interested in areas that have been extensively logged and roaded, like Tally Lake or the Island Unit. They want pristine roadless areas. Other comments include

Procedure - A programmatic EIS on the snowmobile program must be done jointly with the Forest Service and is subject to NEPA. Otherwise, it's basically meaningless. 41-2

43 Woodland Park Drive, #9 • Kalispell, Montana 59901 • (406) 755-6304

Any Forest Service analyses on a site-specific basis may not in any way be tiered to or refer to this PEIS without joint analysis. A MEPA categorical exclusion cannot be expanded into a NEPA categorical exclusion. The basis for a categorical exclusion are too broad. Site-specific decisions cannot be excluded on the basis of this very broad and general PEIS. In addition, the Multi-Party Agreement with the U.S. Forest Service should be subject to NEPA. Final federal decisions regarding new projects must be subject to NEPA, including public comment, analysis and review rights. 41-3

The current situation seems to be a closed circuit of backscratching parties making fundamental decisions about the snowmobile program. If snowmobile clubs were a tail, they would be wagging the dog. Grant applications to the state should be disclosed to the public for comment and review, just as Forest Service actions must be subject to public review under NEPA. 41-4

A comprehensive plan is needed that looks at all winter recreation needs and opportunities in the state and the appropriate role of the state. We need to to end the current process in which the snowmobile clubs set the agenda and make the policy. In fact, the PEIS is an ideal mechanism for looking at the entire funding issue and making recommendations to the Legislature to provide balanced funding and state support for non-motorized recreation. 41-5

General Wildlife - The conclusion that no snowmobile program will impact wildlife much more than an expanded program is faulty. Trails allow quicker access to a broader range of play areas, allowing snowmobilers to cover a much greater distance during the day. There is no evidence that trails discourage unregulated off-trail use; in fact, they expand the opportunity to get off-trail in many more places. 41-6

Ungulates - I recently heard of a new report on Yellowstone bison that indicates that bison winter travel and grazing patterns have changed over the years because of high snowmobile use. I'd like to see this discussed in the Final EIS.

Despite this finding, Yellowstone is a poor model for effects on wildlife. Yellowstone elk are zoo-like all year round and are not phased by human activity. I don't consider them real elk compared to elsewhere in Montana. Studies on elk and snowmobiles in Yellowstone tell us nothing except about elk and snowmobiles in Yellowstone, period. I also note that the studies cited are contradictory on whether big game become habituated to loud mechanized activity. 41-7

The comment about big game showing more flight response to skiers than snowmobiles, even if Yellowstone and other studies are accurate, shouldn't be used to justify a negligible impact determination for the snowmobile program. Snowmobiles typically cover 10 times the territory as cross country skiers, and the large auditory range of the motorized whine expands the impact zone even further. Additionally, snowmobiles are more likely to penetrate areas where wildlife are not accustomed to human disturbance in the winter. A tripling of heart rate in deer from snowmobiles seems to be a significant impact if the deer is subject to a steady stream of motorized harassment. 41-8

Furbearers - Furbearers also are more vulnerable when trappers access to remote backcountry is increased by snowmobile use. The population drop of species such as lynx may be in part due to increased snowmobile access. 41-9

Grizzly - The section on grizzly bear is deficient and clearly was prepared without any meaningful consultation with your department's own experts. The PEIS suggests that bears are potentially affected only when they amble down into ungulate winter range to feed on carrion, and that this poses no conflict since there is no snowmobiling in winter range. In fact, the department's own South Fork Grizzly Bear Study has documented that females with cubs stay near their dens from April 1 to May 11 (see enclosed April 8, 1991 letter). They stay near their dens for security reasons, and they should not be harassed by snowmobilers. This is a particularly important issue because late spring is when alpine snow conditions are most favorable for snowmobile use. 41-10

The indirect effects of the groomed snowmobile trail system can be major on grizzly bears. Easy access to the backcountry from groomed trails facilitates snowmobile use in large expanses of alpine country. For example, 30 miles of groomed trail around the perimeter of the proposed Winton Weydemeyer Wilderness (Ten Lakes Wilderness Study Area) makes it easy for snowmobilers to access these alpine basins. Biologists in your department have reported seeing snowmobile tracks overlaying grizzly tracks in this wilderness study area. Another area of potential grizzly bear conflict from groomed trails is the Whitefish Range, which is accessed from the Canyon Creek area. And the proposed snowmobile trail system in the South Fork of the Flathead poses the same potential problems in the northern Swan Range. The best solution to this problem as well as an overall best management designation for these three areas is wilderness designation with boundaries that do not include existing groomed trails. This recommendation would be an appropriate mitigation measure for the PEIS to make. Additionally, the PEIS must include a requirement that no snowmobile grant money may be used in grizzly bear habitat unless a strict closure in all potential denning areas is observed beginning April 1. 41-11

Indirect effects - The only mention I found about indirect effects was in the assumption on page 65. However, indirect effects such as those mentioned in this letter are virtually unconsidered. This is a major deficiency in the program, particularly regarding indirect effects on wildlife and roadless areas. 41-12

Roadless Issues - State money should not be used under any circumstances to groom trails into inventoried roadless areas. 41-13

Law Enforcement - The primary modifications to the existing program proposed under alternative 3 are an aggressive signing and public awareness program. Law enforcement is virtually ignored, beyond the mention of a paltry $17,000 designated for this purpose and the availability of wardens to issue citations. Please provide a more detailed section on law enforcement and incorporate this into your mitigation/modification alternative with a significantly enhanced priority and budget. 41-14

The public has little faith in the state's snowmobile program when regular violations occur with impunity (snowmobiling in Jewel Basin, illegal swaths cut in the Ten Lakes Wilderness Study Area). The Ten Lakes violation should be considered an indirect effect of the 30-mile groomed trail leading to the scene of the crime. Until responsible officials show a willingness to aggressively enforce area closures and other rules, no expansion of the program should be permitted and some trail segments should be closed.

We will expect these concerns to be fully addressed in the next draft of the PEIS. We appreciate the opportunity to comment.

Sincerely

Steve Thompson
Field Representative

42

BEVERLY MAGLEY
805 SOUTH RODNEY
HELENA MT 59601
(406) 443-7077

Bob Walker
Statewide Trails Program Coordinator
MT Dept. Fish, Wildlife & Parks
1420 E. Sixth Ave.
Helena, MT 59620

April 29, 1993

Mr. Walker,

I have a number of comments and suggestions regarding the Draft Programmatic Environmental Impact Statement for the Snowmobile Grant Program.

1) The maps provided in the PEIS are entirely -- and possibly, intentionally -- inadequate and vague. There is no possible way to evaluate the specific trails proposed for the trail-grooming program if the public cannot even determine which trails are actually being addressed. 42-1

2) The alternatives presented are too few. You must include alternatives of NOT promoting, grooming, and maintaining trails in sensitive or roadless areas. 42-2

3) Marking, grooming, and maintaining trails into roadless areas, and right up to wilderness boundaries, encourages both willful and unknowing trespass violations.

4) 33,000 miles of roads are already available on the national forests in Montana. Through the gas tax, non-snowmobilers are already forced to support 3,200 miles of snowmobile trails. Costly development and maintenance of new trails into fragile areas or dense wildlife habitat is unnecessary and shows a flagrant disrespect for the intention of wilderness. 42-3

5) The lack of diversity among members of the snowmobile trail advisory council suggests that your proposals will -- and do -- lack a balanced view of non-snowmobile recreation. 42-4

The impacts of snowmobiles on non-motorized recreation must not be discounted. There should be easily accessible places to cross-country ski in silence, just as there must be places for snowmobilers to congregate, and enjoy a noisy day out together. Montana Department of Fish, Wildlife and Parks data show that there are NINE nonmotorized trail users for every one motorized user; just one of five winter recreationists use snowmobiles. Your PEIS disregards this data and promotes snowmobile use into unsuitable areas. 42-5

Thank you for the opportunity to comment.

Beverly Magley

43

Mt. Depart. of F.W.& Parks Snowmobile Trail Program

Hearing: 4/29/93

More areas along with the spending of more tax money for motorized recreation I as a taxpayer am against. Its not just money alone that I consider. The increasing motorized recreational activities also are hastening the decay of our so far unroaded areas. These things need not happen if our love of materialism and the easy life weren't so excessive. If this form of pleasure seeking would not increase the request for new places to motor we wouldn't be spending more and more tax monies funding this expensive, destructive mode of having fun. Too much leisure time along with too much of some one elses money yields degeneration. Read a history book sometime and just see if this hasn't been the case in all 13 chapters. So lets not open to motor vehicle traffic of any kind the 10 Lakes, the Badger Two Medicine, Crazy Mountains and others. The Parks Dept and other government entities in promoting opening of these areas to ORV use is only hastening the decay of our so far yet undisturbed landscape little of which remains. 43-1

Gordon Thompson
1027 N. Jackson
Helena, Mt. 59601

Gordon Thompson

44

DEPARTMENT OF STATE LANDS

MARC RACICOT GOVERNOR

STATE OF MONTANA

April 29, 1993

MEMORANDUM

TO: Bob Walker, State Trails Program Coordinator
Department of Fish, Wildlife and Parks

FROM: Scott Frickel, Land Management Specialist
Department of State Lands Scott

RE: Comments on Draft Snowmobile Grant PEIS

Mr. Chuck Wright, Area Manager of the Department of State Lands (DSL) Southwestern Area Office in Missoula, attended the public hearing regarding the above-referenced document which was held by the Department of Fish, Wildlife and Parks (DFWP) on April 27, 1993.

Based on information offered at the public hearing and our review of the document, DSL feels that the E.I.S. adequately addresses our concerns regarding the program. Specifically, the third paragraph on page 8 of the document entitled "Montana Department of State Lands", states that a party requesting a trail through State Land is required to acquire the appropriate Land Use License from DSL. Any concerns which DSL may have regarding the proposed use will be addressed in our review of the plan of operation, information which may be deemed necessary to complete an EA and through coordinated review with DFWP. 44-1

Thank you for providing the opportunity for DSL to comment.

/ne

c: Chuck Wright/SWLO
Jeanne Fairbanks/Forestry

45

April 30, 1993

Michael Ford
119 1st St.
Whitefish, MT 59937

Comments on DRAFT Snowmobile EIS

I am disturbed by the implementation of this program which would increase wasteful use of resources. Snowmobiles are loud and obnoxious and they are intrusive and disturbing to wildlife at a time of the year when the animal's energy conservation is critical. They have an affect on the solitude of non-motorized users. I would suggest this program's funding be obtained directly from the snowmobilers, whether it be in the form of gas taxes paid at the pump or a more direct form of funding. 45-1

I would like to see more of the funding be devoted patrolling and enforcement of snowmobiling regulations. 45-2

I would prefer to see alternative #2 instituted--not have the program transferred to another agency, but to have the program abolished.

Michael J. Ford

would like to be on mailing list for further changes

46

Mike Vashro
1204 Sorenson Road
Helena, MT 59601

Called 4/30 re: Snowmoblie Programmatic EIS - comments

Proposal #2 - Should the state be involved in Snowmobiling? - He doesn't think so from the standpoint that when more than one agency is involved it complicates things. Why not just let the USFS continue to manage...

Feels that snowmobilers should be required to use existing roads - don't create new trails. Some $ should go to enforcement which is pretty nonexistent at this time.. Has seen a lot of problems and feels there isn't anybody out there enforcing any laws. 46-1

Feels some of the money should be given to summer care and maintenance of roads. Roads do deteriorate from runoff, snow package and tend to sluff as a result of snowmobiling. Snowmobiling causes heavy snowpack on roads, leaving water and water damage for a longer period of time. This problem should be alleviated partly by snowmobile funds. 46-2

THANKS

47

Mr. Bob Walker/MDFWP
1420 E. 6th Avenue
Helena, MT 59620

Dear Sir:

I am strongly opposed to constructing new snowmobile trails in wildlife wintering ranges or wildlife travel corridors in Montana. Wildlife in Western Montana are under constant pressure from hunters, tourism, and local recreationalists. 47-1

I would hope the MDFWP has learned a lesson with the loss of the bull trout. Your first priority is to protect wildlife. The days when you could bypass environmental laws are over.

The U.S. Forest Service has done an EIS for the Desert Mtn. and Halfmoon areas and recommends a year round closure of motorized vehicles to protect deer, elk, moose and grizzly bear habitat. With the thousands of miles of logging roads constructed over the past 50 years, there should be plenty of trails for snowmobilers to use that would not affect wildlife and people. I have not talked to a single local snowmobiler who wants to commercialize snowmobiling in Western Montana. 47-2

Lastly, snowmobile trails absolutely should not be allowed in populated valley floors. There is no need to snowmobile directly to your doorstep or hotel room. This issue has been settled the last time a request for a groomed trail was made. People don't want the noise and disregard for private property to occur. 47-3

Snowmobiling is a great winter sport and new trails should be carefully planned and all options explored. MDFWP does not represent the snowmobile industry. Your job is to protect what we have left in Montana.

Sincerely,

John Bengtson

John Bengtson
P.O. Box 335
West Glacier, MT 59936

48

Apr.l 30, 1993

Mr Bob Walker
MDFW Park Division
1420 E. 6th Avenue
Helena, MT 59620

Dear Mr Walker:

The following numbered items are responses to the prepared Programatic Environmental Impact Statement (PEIS) on the State's Snowmobile grant program:

1. NEPA procedures (Nat'l Environmental Policy Act and EOs (Federal Executive Orders 11644/11989 which apply to National Forests have not been implemented. These require designation of snowmobile zones to avoid and minimized harassment or disruption of wildlife habitats 48-1

2. 65% or more of the winter ranges for the Bob Marshall Elk management Unit (Emu) are outside of the wilderness and are very threatened by human encroachment. Commercial trails in the Winter ranges of the Bob Marshall Elk Management units must be avoided 48-2

3. 1992 Elk Management Plan was ignored in the PEIS. This plan to rezone large areas to Snowmobile access conflicts with a primary MDFWP duty to "enforce all the laws of the state respecting the protection, preservation, and propagation of game animals, MCA 87-1-201(2). 48-3

Page 2
Mr Bob Walker

4 There is need to Protect and preserve whats left of existing Wintering Ranges and Corridor passage ways for large game animals. Current up to date research is needed from NW Montana before impacting wild elk of NW Montana to significant commercial noise and disturbance. There is great difference in behaviors of a habituated elk when compared to wild elk. **48-4**

5 This State PEIS has no authority on Federal lands. The State PEIS attempts to make new trails on Federal Lands a Categorical Exclusion exempt from NEPA review (P. 103-104; Appendix A, p.). By law, the Forestry Service must be a "joint lead agency" when involved in an action such as this PEIS. **48-5**

6. There are other alternatives for expenditures of State Gas Monies. PEIS fails to consider alternatives as more money spent on increase enforcement of Snowmobile laws, violation citation, promoting snowmobile facilities, education improved testing requirements **48-6**

In closing historic elk winter ranges, wildlife corridors, and riparian habitats need full protection. Federal laws pertaining to this hoax of a draft PEIS must be recognized. Where is the authority granted to MDFWP?

Sincerely,
Gerald A. Randolph
PO Box 11
West Glacier MT 59936

49

P.A F. and Stormy de Lepper
231 Deer Trail
Whitefish, Montana 59937

April 29, 1993

Mr. Bob Walker
Statewide Trails Program Coordinator
Montana Dept of FW&P
1420 East Sixth Avenue
Helena, MT 59620

Re: *April 1993 Draft Programmatic Environmental Impact Statement of the Montana Snowmobile Grant Program*

Dear Mr. Walker:

Thank you for allowing us the opportunity to submit comments on the above-referenced PEIS. After reviewing the PEIS, we urge the Montana Department of Fish, Wildlife & Parks to adopt Alternative 1 (no action). We firmly believe that 3,200 miles of snowmobile trails is overly sufficient for approximately 4 percent of the total population of the State of Montana. In addition, we adamantly oppose the additional trails proposed by FW&P which infringe upon federal lands proposed for wilderness by our congressional delegation, in addition to federal lands proposed for wilderness by the U.S. Forest Service.

We appreciate that FW&P wishes to enhance recreational opportunities for Montanans; therefore, we urge FW&P to use any additional funds from any increase in a gas tax to establish trails that would be used by a majority of Montanans, *i.e.*, those who cannot afford snowmobiles or do not use snowmobiles. Bike paths, horse trails, cross country ski trails and just plain hiking trails are needed desperately. Then, if FW&P has money left over, maybe they could return that money to the Highway Fund as the Fund desperately needs it. **49-1**

Again, thank you for allowing us to comment on the PEIS. We request this letter be submitted into the record for the PEIS on the Montana Snowmobile Grant Program.

Sincerely,

P.A F. and Stormy de Lepper

50

FLATHEAD WILDLIFE, Inc.
P.O. BOX 4
KALISPELL, MONTANA 59903

April 29, 1993

Mr. Bob Walker
Trails Coordinator
Mt Dept. Fish Wild. and Parks
1420 E. 6th Ave.
Helena, Mt 59620

Dear Mr. Walker:

We would like to express our concerns about the Programmatic Environmental Impact Statement (PEIS) for the Montana Snowmobile Grant Program. Overall, we think the PEIS is a sound document that outlines the criteria for evaluating applications for new snowmobile trails.

However, we are concerned about the impact of snowmobiling on wintering populations of ungulates in northwestern Montana. The topography and vegetation in this area is much different than in the study areas cited in the section on impacts upon wildlife. Therefore, we recommend that all applications for new trails through winter range habitat be tabled until studies evaluating the impacts of snowmobiles upon wintering ungulates in northwest Montana are completed. **50-1**

We would ,also, like to point out that a recent survey done for the US Forest Service in Montana found out that by over a 2 to 1 margin people do not want an increase in motorized recreation in the national forests. **50-2**

We appreciate the opportunity to review and comment on this document.

Sincerely yours,

Bruce May
Bruce May
Public Lands Coordinator

montana wildlife federation

The Wealth Of Our Nation Is In Its Natural Resources
Preserve It By Conservation, Not Conversation

MONTANA

51

April 29, 1993

To whom it may concern

$471,000 to groom snow-mobile trails? Are you serious? There is one place you can cut back on the debt!!! Our chalets have been closed because of lack of money for much needed repairs. Put that money into a fund to collect interest.

Put the $471,000 you didn't use on trail grooming before snow mobiling became a 'sport.' Tax dollars are not being spent wisely here.

Snowmobiling is noisy, expensive, wasting gasoline (at least we are told to share rides to save gas) polluting the air (we are told sharing rides will cut down on air pollutants) And you need another EIS??

Another government handout! EIS are costly! Get your heads out from under your arms! Stand up & do what you know is best for Montana. Sometimes common sense is missing in our state & federal governments. You know what is best for the environment, budget etc. Perhaps you enjoy snow mobiling yourself. You will have to be impartial.

Saying simply "We don't have $471,000 to spend," will save alot of precious time & money. Then stick to your guns & let it rest. **51-1**

Sincerely,
[illegible]
Bigfork 59911

RECEIVED
[illegible] 1993

52

April 28, 1993

Bob Walker
State Trails Program Coordinator
Department of Fish, Wildlife and Parks
1420 East 6th Avenue
Helena, Mt 59620

Re: Snowmobile PEIS

Dear Mr. Walker:

We are avid snowmobilers. We believe winter in Montana is a good example that motorized recreation can be enjoyed by many people with very minimal impact to our environment. Snowpack is enhanced by snowmobile traffic. We all agree this is a big plus. 52-1

Sincerely
Ted & Ronda Johnda
PO Box 274
Melville, MT 59055

53

Greater Yellowstone Coalition

April 28, 1993

Bob Walker
Statewide Trails Program Coordinator
MT Fish, Wildlife, and Parks
1420 East Sixth Avenue
Helena, MT 59620

The Greater Yellowstone Coalition (GYC) is very concerned about the dramatic escalation in motorized trespass violations and wildlife and recreation impacts from snowmobile use in western Montana. We feel that there is a definite need for a Programmatic Environmental Impact Statement (PEIS) to formally define and review the state of Montana's Snowmobile Grant Program, as well as to fulfill the legal requirements of the Montana Environmental Policy Act. However, the existing Draft PEIS is completely inadequate, as it appears to only describe more explicitly a flawed planning process, fails to address any of the tougher issues, or make meaningful program recommendations. Specifically, the PEIS is deficient for the following reasons:

53-1 1) Forest Service is not joint lead agency in PEIS: The vast majority of state groomed and signed trails occur on national forest lands. The Forest Service's analysis of impacts from individual trails will be tiered to the state's PEIS (page iii), which falsely concluded that new snowmobile trails would have "minor and negligible impacts" on wildlife, air quality, soils, erosion, riparian and winter habitats, and aesthetics (page 102-104). Furthermore, the operating agreements for these state grant trails not only commit the Forest Service to allowing snowmobile use over their affected lands, but also allow snowmobile clubs to improve trails by grading, clearing, and bridge construction (Appendix B). Considering that Forest Service environmental impact determinations for individual snowmobile trails will be tied to this PEIS and are potentially challengeable, it is critical that the Forest Service be a joint lead agency in this PEIS.

53-2 2) No requirement for public notification or public input: As GYC understands the planning process outlined in the PEIS, the Department of Fish, Wildlife, and Parks and Forest Service are restricted to a purely reactionary role. There is no proactive planning by either agency. Instead, snowmobile clubs basically get to decide without public input or notification where and how existing public trails are managed for snowmobiling and how and where new trails are to be developed on public lands. Despite the fact that the snowmobile program is a state program, funding decisions are made by the Montana Snowmobile Association's Trail Grooming Committee and one Department official without any public notice. This must change. The PEIS needs to include formal measures for public review and input with each snowmobile club's grant request.

53-3 3) PEIS fails to consider comprehensive trail planning: While the PEIS discusses the possibilities for interstate and linked snowmobile trail systems, it fails to address the need for non - motorized trail planning. The Department is at least currently looking at statewide comprehensive trail planning with its Statewide Comprehensive Outdoor Recreation Plan (SCORP), but the PEIS fails to indicate how SCORP integrates with the snowmobile grant program.

53-4 4) Insufficient protection for Wilderness, roadless, winter habitat, or other restricted areas: GYC is very concerned about the use of this PEIS and snowmobile grant requests to open trails in wilderness areas, wilderness study areas, roadless areas, or other non - motorized use areas to future snowmobile use. Some of the existing grant trails indicated on Figure 1-2 appear to already be inside some of these types of areas. The PEIS needs to both provide much clearer (bigger scale) maps of the existing 28 grant funded trails and clearly state that snowmobile grant funds will in no way be used to allow snowmobile signing, grooming, or improvements in any motorized restricted area (wilderness areas, wilderness study areas, roadless areas, or other). With 33,000 miles of existing system roads on Montana national forests, the Parks Division has no business promoting snowmobile trails into any restricted lands or lands under consideration for wilderness or winter wildlife habitat.

53-5 5) Insufficient Law Enforcement: Of the 1/2 of 1% of Montana's Distributor Gasoline Tax that is allocated to the state snowmobile grant fund (approximately $475,000), less than a 1/30 of it is spent on law enforcement. Much of the burden of enforcement then falls on the Forest Service. The PEIS not only does not correct this gross deficiency of enforcement funding, but offers signing as the main mitigation measure. Signing alone is not an effective enforcement tool -- especially when some of the singing will be for trail locations and "watchable wildlife" opportunities (page 33). Ground patrols, school and group educational presentations, aerial overflights, and increased fines should also be incorporated with the increased enforcement funding that this PEIS must require. Furthermore, the PEIS states (page 29) that, "grant plans would be developed to avoid, when possible, passage near boundaries with wilderness areas and non - motorized recreation areas," and signs near these boundaries would, "request snowmobilers remain on the groomed trails." Instead, the PEIS should state that grant funded trails will not be located near wilderness area/non- motorized use area boundaries and signs at these boundaries will inform snowmobilers that any off trail travel into these areas is a federal offense punishable by fines and machine impoundment.

53-6 6) Funding for non - motorized: The SCORP (1993 Draft) shows that for every one motorized trail user there are nine non - motorized trail users. Yet, the Parks Department doesn't spend a cent to improve or maintain trails for 90% of Montana trail users. The PEIS states (page 31) that an alternative that addressed equitable funding was dismissed as being out of the scope of the PEIS (Page 32). GYC firmly believes that a programmatic EIS, which are supposed to review an entire program's goals, is the logical place where this larger funding question should be considered. The PEIS should include in the text and appendix a discussion of the constraints on the snowmobile grant program's funding as stipulated in Montana law and Department rules.

53-7 6) Impacts to non - motorized not recognized: The PEIS falsely concludes that there will be "negligible and minimal" impacts to non - motorized trail users. In reality, the experiences sought by non - motorized users and motorized users are usually quite different and the two do not mix well with the non - motorized user typically being displaced. This occurs every time an existing trail or road is designated, signed, groomed, or in any way promoted for snowmobile use. The PEIS needs to better assess the impacts to the recreational "silent majority" from the snowmobile grant program. This is another key reason why the PEIS needs to establish public notification and review provisions for individual grant requests and address the larger need for comprehensive winter trail planning.

53-8 7) Flawed assessment of wildlife impacts: Many of the elk in Montana are habitat specific and not habituated to man's commercial use and noise. The PEIS wrongly concludes that the state snowmobile grant program does not impact ungulate habitat or population numbers (page 80) by relying on outdated studies from the 1970s and studies of Yellowstone Park elk populations. Yellowstone Park elk, which are not hunted and are totally habituated to man and snowmobiles, are not at all representative of elk populations over the rest of Montana. More applicable and recent MTFWP elk studies from northwest Montana, which show significant elk vulnerability and adverse impact of snowmobiling, have been omitted from the PEIS analysis. Furthermore, the state's Elk Management Plan was totally ignored in the PEIS, despite the fact that some of the existing state grant trails, as well as some of the expected new trail proposals, are located in important winter range.

GYC appreciates this opportunity to comment on the draft PEIS, which we consider to be critical to stemming the increasing snowmobile impacts that are occurring to wildlife, wilderness, and recreationists throughout Montana. Any response would be greatly appreciated. Please send us the final PEIS and any notices of new snowmobile grant requests in south - central and southwestern Montana.

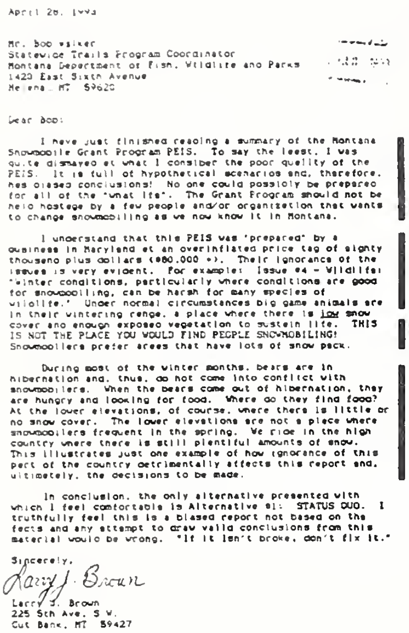
Sincerely,
Peter Aengst

Peter Aengst
Program Assistant

cc: Region I Forest Service Recreation Staff Officer
Pat Graham, Director MTFWP
John Gatchell, MWA

P.O. Box 1874 • Bozeman, Montana 59771 • (406) 586-1593 • FAX (406) 586-0851

54



April 26, 1993

Mr. Bob Walker
Statewide Trails Program Coordinator
Montana Department of Fish, Wildlife and Parks
1420 East Sixth Avenue
Helena, MT 59620

Dear Bob:

I have just finished reading a summary of the Montana Snowmobile Grant Program PEIS. To say the least, I was quite dismayed at what I consider the poor quality of the PEIS. It is full of hypothetical scenarios and, therefore, has biased conclusions! No one could possibly be prepared for all of the "what ifs". The Grant Program should not be held hostage by a few people and/or organization that wants to change snowmobiling as we now know it in Montana.

54-1

I understand that this PEIS was "prepared" by a business in Maryland at an overinflated price tag of eighty thousand plus dollars ($80,000 +). Their ignorance of the issues is very evident. For example: Issue #4 - Wildlife: "Winter conditions, particularly where conditions are good for snowmobiling, can be harsh for many species of wildlife." Under normal circumstances big game animals are in their wintering range, a place where there is low snow cover and enough exposed vegetation to sustain life. THIS IS NOT THE PLACE YOU WOULD FIND PEOPLE SNOWMOBILING! Snowmobilers prefer areas that have lots of snow pack.

54-2

54-3

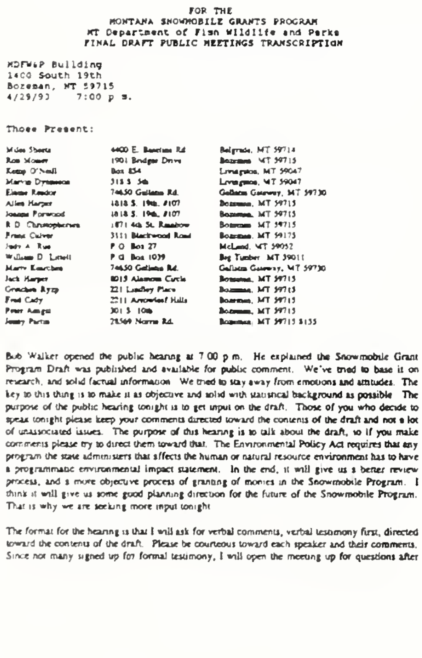
During most of the winter months, bears are in hibernation and, thus, do not come into conflict with snowmobilers. When the bears come out of hibernation, they are hungry and looking for food. Where do they find food? At the lower elevations, of course, where there is little or no snow cover. The lower elevations are not a place where snowmobilers frequent in the spring. We ride in the high country where there is still plentiful amounts of snow. This illustrates just one example of how ignorance of this part of the country detrimentally affects this report and, ultimately, the decisions to be made.

54-4

In conclusion, the only alternative presented with which I feel comfortable is Alternative #1: STATUS QUO. I truthfully feel this is a biased report not based on the facts and any attempt to draw valid conclusions from this material would be wrong. "If it isn't broke, don't fix it."

Sincerely,
Larry J. Brown
Larry J. Brown
225 5th Ave. S.W.
Cut Bank, MT 59427

B



FOR THE
MONTANA SNOWMOBILE GRANTS PROGRAM
MT Department of Fish Wildlife and Parks
FINAL DRAFT PUBLIC MEETINGS TRANSCRIPTION

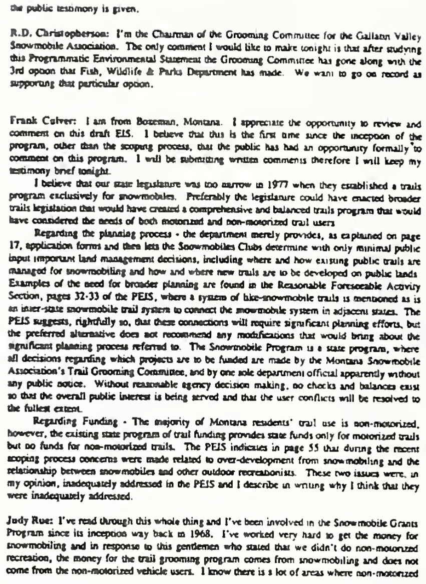
MDFW&P Building
1400 South 19th
Bozeman, MT 59715
4/29/93 7:00 p.m.

Those Present:

Miles Sheets	4400 E. Baseline Rd	Belgrade, MT 59714
Ron Moser	1901 Bridger Drive	Bozeman, MT 59715
Kemp O'Neill	Box 834	Livingston, MT 59047
Marvin Dyrness	315 S. 5th	Livingston, MT 59047
Elaine Reador	74650 Gallatin Rd.	Gallatin Gateway, MT 59730
Allen Harper	1818 S. 19th, #107	Bozeman, MT 59715
Joanne Porwood	1818 S. 19th, #107	Bozeman, MT 59715
R D Christopherson	1871 4th St. Rainbow	Bozeman MT 59715
Frank Culver	3111 Blackwood Road	Bozeman, MT 59175
Judy A. Rue	P O Box 27	McLeod, MT 59052
William D. Littell	P O Box 1039	Big Timber MT 59011
Marty Kearchen	74650 Gallatin Rd.	Gallatin Gateway, MT 59730
Jack Harper	8015 Alamosa Circle	Bozeman, MT 59715
Gretchen Rypp	221 Lindley Place	Bozeman, MT 59715
Fred Cady	2211 Arrowleaf Hills	Bozeman, MT 59715
Peter Aengst	301 S. 10th	Bozeman, MT 59715
Jerry Partin	28569 Norris Rd.	Bozeman, MT 59715 8135

Bob Walker opened the public hearing at 7:00 p.m. He explained the Snowmobile Grant Program Draft was published and available for public comment. We've tried to base it on research, and solid factual information. We tried to stay away from emotions and attitudes. The key to this thing is to make it as objective and solid with statistical background as possible. The purpose of the public hearing tonight is to get input on the draft. Those of you who decide to speak tonight please keep your comments directed toward the contents of the draft and not a lot of unassociated issues. The purpose of this hearing is to talk about the draft, so if you make comments please try to direct them toward that. The Environmental Policy Act requires that any program the state administers that affects the human or natural resource environment has to have a programmatic environmental impact statement. In the end, it will give us a better review process, and a more objective process of granting of monies in the Snowmobile Program. I think it will give us some good planning direction for the future of the Snowmobile Program. That is why we are seeking more input tonight.

The format for the hearing is that I will ask for verbal comments, verbal testimony first, directed toward the contents of the draft. Please be courteous toward each speaker and their comments. Since not many signed up for formal testimony, I will open the meeting up for questions after



the public testimony is given.

R.D. Christopherson: I'm the Chairman of the Grooming Committee for the Gallatin Valley Snowmobile Association. The only comment I would like to make tonight is that after studying this Programmatic Environmental Statement the Grooming Committee has gone along with the 3rd option that Fish, Wildlife & Parks Department has made. We want to go on record as supporting that particular option.

B-1

Frank Culver: I am from Bozeman, Montana. I appreciate the opportunity to review and comment on this draft EIS. I believe that this is the first time since the inception of the program, other than the scoping process, that the public has had an opportunity formally to comment on this program. I will be submitting written comments therefore I will keep my testimony brief tonight.

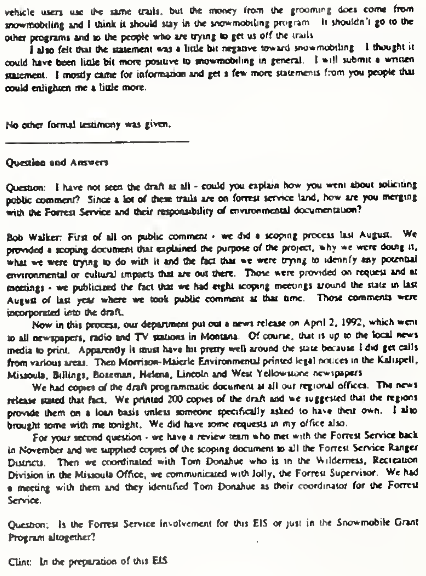
I believe that our state legislature was too narrow in 1977 when they established a trails program exclusively for snowmobiles. Preferably the legislature could have enacted broader trails legislation that would have created a comprehensive and balanced trails program that would have considered the needs of both motorized and non-motorized trail users.

Regarding the planning process - the department merely provides, as explained on page 17, application forms and then lets the Snowmobiles Clubs determine with only minimal public input important land management decisions, including where and how existing public trails are managed for snowmobiling and how and where new trails are to be developed on public lands. Examples of the need for broader planning are found in the Reasonable Foreseeable Activity Section, pages 32-33 of the PEIS, where a system of bike-snowmobile trails is mentioned as is an inter-state snowmobile trail system to connect the snowmobile system in adjacent states. The PEIS suggests, rightfully so, that these connections will require significant planning efforts, but the preferred alternative does not recommend any modifications that would bring about the significant planning process referred to. The Snowmobile Program is a state program, where all decisions regarding which projects are to be funded are made by the Montana Snowmobile Association's Trail Grooming Committee, and by one sole department official apparently without any public notice. Without reasonable agency decision making, no checks and balances exist so that the overall public interest is being served and that the user conflicts will be resolved to the fullest extent.

B-2

Regarding Funding - The majority of Montana residents' trail use is non-motorized, however, the existing state program of trail funding provides state funds only for motorized trails but no funds for non-motorized trails. The PEIS indicates in page 55 that during the recent scoping process concerns were made related to over-development from snowmobiling and the relationship between snowmobiles and other outdoor recreationists. These two issues were, in my opinion, inadequately addressed in the PEIS and I describe in writing why I think that they were inadequately addressed.

Judy Rue: I've read through this whole thing and I've been involved in the Snowmobile Grants Program since its inception way back in 1968. I've worked very hard to get the money for snowmobiling and in response to this gentlemen who stated that we didn't do non-motorized recreation, the money for the trail grooming program comes from snowmobiling and does not come from the non-motorized vehicle users. I know there is a lot of areas where non-motorized



vehicle users use the same trails, but the money from the grooming does come from snowmobiling and I think it should stay in the snowmobiling program. It shouldn't go to the other programs and to the people who are trying to get us off the trails.

I also felt that the statement was a little bit negative toward snowmobiling. I thought it could have been little bit more positive to snowmobiling in general. I will submit a written statement. I mostly came for information and get a few more statements from you people that could enlighten me a little more.

B-3

No other formal testimony was given.

Question and Answers

Question: I have not seen the draft at all - could you explain how you went about soliciting public comment? Since a lot of these trails are on forrest service land, how are you merging with the Forrest Service and their responsibility of environmental documentation?

Bob Walker: First of all on public comment - we did a scoping process last August. We provided a scoping document that explained the purpose of the project, why we were doing it, what we were trying to do with it and the fact that we were trying to identify any potential environmental or cultural impacts that are out there. Those were provided on request and at meetings - we publicized the fact that we had eight scoping meetings around the state in last August of last year where we took public comment at that time. Those comments were incorporated into the draft.

Now in this process, our department put out a news release on April 2, 1992, which went to all newspapers, radio and TV stations in Montana. Of course, that is up to the local news media to print. Apparently it must have hit pretty well around the state because I did get calls from various areas. Then Morrison-Maierle Environmental printed legal notices in the Kalispell, Missoula, Billings, Bozeman, Helena, Lincoln and West Yellowstone newspapers.

We had copies of the draft programmatic document at all our regional offices. The news release stated that fact. We printed 200 copies of the draft and we suggested that the regions provide them on a loan basis unless someone specifically asked to have their own. I also brought some with me tonight. We did have some requests in my office also.

For your second question - we have a review team who met with the Forrest Service back in November and we supplied copies of the scoping document to all the Forrest Service Ranger Districts. Then we coordinated with Tom Donahue who is in the Wilderness, Recreation Division in the Missoula Office, we communicated with Jolly, the Forrest Supervisor. We had a meeting with them and they identified Tom Donahue as their coordinator for the Forrest Service.

Question: Is the Forrest Service involvement for this EIS or just in the Snowmobile Grant Program altogether?

Clint: In the preparation of this EIS

Bob Walker: That is how we involved the Forrest Service in this EIS and the BLM was the same way. They also got multiple copies of the draft for an internal review also. Also, for your information, our team from the department included one of the Park Managers from Missoula, myself, John Mundinger who is a Special Assistant to the Director of our Department, his background is in Fish and Wildlife Management, Jim Domino who is a State Outdoor Recreation Planner and drafts our state comprehensive outdoor recreation plan, Glenn Erickson is the Chief of our Wildlife Management Bureau who's background is in Fish and Wildlife Management, Elmer Davis who recently retired and was program manager for our Law Enforcement Team, and then Liz Laudman who is our Recreational and Vehicle Safety and Education Program. Then Morrison-Maierle Environmental, Mike Fillinger, President of MME, Bob Carroll dealt with Vegetation and Wildlife, - all these people and their backgrounds are found in the document. We did have good spread of expertise.

Question: I guess what I was asking in regard to the Forrest Service involvement is if this includes opening areas to snowmobile use on federal land that before had been closed, doesn't the Forrest Service have to go through and EIS process on their own? If so, how does that work?

Bob Walker: That is correct. All existing mandates and federal laws have to be met. This is a programmatic EIS on the State's Grant Program only. So, if a new trail is proposed on federal lands, NEPA will have to be satisfied and they would have to go through the NEPA process just as they have in the past. They will have to go through the archeological and cultural studies. All existing federal laws would have to be satisfied by the land managers before it even gets to us. This gives a review process at the state level when a sponsor applies for a grant to be sure that all those studies have been conducted adequately.

The PEIS also gives advice on future trail signing in order to better inform the user pubic and wildlife impacts and air quality impacts and safety. Frankly, what it has done is to help us from a grant's standpoint, about how to better inform the snowmobile user public through signs, maps and future expanded training programs.

So, yes, the Forrest Service will still have to go through all the federally mandated requirements before it ever gets to us

Question: Does that mean that the area you are addressing does not involve any new areas?

Bob Walker: It could. This is not site specific, it is a state-wide programmatic. Therefore, what it does is on new trails - as a matter of fact there is an eight page checklist in here that we worked up as a draft checklist that all clubs will have to go through on a new trail system. The existing systems will have to go through this process within three years.

Question: Bob, would you clarify the funding question?

Bob Walker: Explained the funding for the snowmobile grants program.
(gas tax and decal fee)

Question: Where did the funds for this study comes from and will all the user groups that impact the State of Montana on state or federal will be required to do the same thing and where will they be funded from?

Bob Walker: The snowmobilers of Montana payed the bill. It came out of your snowmobile gas tax and decal monies. Specifically out of the account that buys snow groomers. It cost $84,600. That is why there were no groomers bought last year. It had the support of the Montana Snowmobile Association and the department.

In answer to the second question - yes in the long run, all trail users will have to satisfy MEPA. We are starting a state trails plan. There will be an inventory first, a questionnaire of users to find out the needs and demands of trails, then the last step will be a Programmatic Environmental Impact Statement on the Comprehensive Trails Program. That money will come from a mixture of money from the National Park Service, the Off-Highway Vehicle Program, and the remainder will have to come from State Parks, either the Coal Tax or an additional appropriation.

Question. Will you describe the process under the state's preferred alternative for grooming new trails? What will the administrative criteria be?

Bob Walker: From start to finish, the requests come from a local snowmobile club or a sponsor, which will go through the National Forrest Service or the BLM depending on the land it is on. Then we require a multi-party agreement with the land manager and the state and the program sponsor. If it is on federal land, it will have to satisfy NEPA and will have to be incorporated as part of the Travel Management Plan. If it is a new trail, it will have to have the clearance of the Wildlife Biologist in the area. Then they will have to go through the checklist. They will have to go through those steps before the request for funding ever comes to us

There is an option in here for a categorical exclusion. Basically that is a continuation of the existing program with no on-ground changes and that has previously satisfied MEPA. (Bob explained the categorical exclusion further in detail.)

When we get the application, we review it to be sure everything has been done properly. Then we submit it to the State Trails Advisory Committee who reviews it and decides who gets how much. The grooming is reviewed first. The new development is reviewed second. Then requests for new equipment is reviewed next. They make the recommendations and our department director has the final responsibility to give his approval. But to date the recommendations of the Advisory Committee as always been approved.

Clint Erb. Gave a brief overview of the PEIS process and what was involved in this particular PEIS and how the alternatives, recommendations and modifications in the PEIS came about.

Comment. The impacts of snowmobiling does not always have to be negative, there can be some positive impacts also. I felt that there could have been more positive stressed in the PEIS.

Question. Is there anything available on the noise impacts to wildlife? What studies did you use?

Clint: Some of the studies that were done on wildlife addressed in the PEIS, specifically some of the more physiological responses to snowmobiles, there were references in those studies to noise. That was what those studies were based on. There was one on the particular study of the heart rate of elk and mule deer in relation to snowmobiled and also stopping snowmobiles and moving snowmobiles, skiers, standing, walkers, etc. - and what enlisted a flight response out of all of those.

Question: Did the snowmobile effect them much?

Clint: Interestingly enough, one of the studies stated that all of the above changed the heart rate of the animal. As far as what enlisted flight was the person on foot more than the snowmobile. As long as the object was moving the heart rates increased but the flight was less than when the person stood up.

Question: Who, what, when will it be decided regarding the selection of the alternatives?

Bob Walker: After the hearings are completed, and we make the modifications that come out of these hearings, then the department will make the decision when the final is completed. Hopefully, the latest will be in August or September.

Question: If a snowmobile club applies for a grant for a new trail to be groomed and it meets all the state and federal requirements and it is granted, then there seems to be an increased need for law enforcement. How will that be shared - both federal and state? It states in the PEIS that $1 goes for law enforcement, is there potential for an increased percentage for law enforcement?

Bob Walker: There was a new law signed by the Governor called a Snowmobile Cleanup Bill, that increased the decal fee from $2 to $5. That will increase the amount of money going to FW&P's law enforcement from $15,000/year to $40,000/year. The federal side is a cooperative venture. A new federal law makes agents ex-officio wardens for the state as well, so they can help with law enforcement. But it will rely strictly on cooperation.

Question: Will the increased money to the snowmobile program from the decal fee raise be strictly for law enforcement?

Bob Walker: No, there is a great need for new groomers or groomer replacement. One of the future efforts in the snowmobile program is to link trail systems. Even if the snowmobile funds doubled, you wouldn't see a doubling in the miles of trail - what you would see is more regular upgrades of the grooming equipment. Possibly there would be some additional trails added.

The hearing adjourned at 8:15 p.m.

M

MDFW&P Building
Missoula, MT 59801
4/27/93 7:00 p.m.

Those Present:

Effie & Wimp Kamp	1163 Sleeping Child	Hamilton MT
Alan Brown	5320 Big Flat Rd	Missoula MT 59801

Bob Walker opened the public hearing at 7:00 p.m. He explained the purpose of the meeting was to gather public comment on the Snowmobile Grant Program Draft. He opened the public hearing for verbal testimony.

No public comment was given.

Hearing was adjourned.

K

MDFW&P Building
Outlaw Inn, Stagecoach Room
Kalispell, MT 59901
4/28/93 7.00 p m

Those Present:

Sheila Keller	183 Fairmont	Kalispell, MT 59901
Tom Longfield	Box 224	Kalispell, MT 59901
Peggy Wagner	Box 190021	Hungry Horse, MT 59919
Mert Phillips	490 N. Meridian	Kalispell, MT 59901
John Altenburg	Box 2443	Kalispell, MT 59901
Rep. Doug Wagner	Box 21	Hungry Horse, MT 59919
Don Schwennesen	Box 24	Kalispell, MT 59903
Herb Clark	Box 146	Trego, MT 59934
Bill Bodenbeck	627 2nd St. E.	Whitefish, MT 59937
Steve Thompson	43 Woodland Park Dr #9	Kalispell, MT 59901
Sharon L. Wilkows	Box 422	Hungry Horse, MT 59919
Connie Keller	191 Bayou Rd.	Kalispell, MT 59901
Carol Pike	Columbia Falls CCC	
	Box 312	Columbia Falls, MT 59912
Terry Kamp	Box 347	Hungry Horse, MT 59919
Jim Hannah	308 2nd St. S W	Cut Bank, MT 59427
S. Bud Bergler	432 Mt. View	Cut Bank, MT 59427
Bob Pellett	416 Circle Dr.	Cut Bank, MT 59427
Donald Kern	533 Capistrano Dr.	Kalispell, MT 59901
Ross Titus	Box 1079	Bigfork, MT 59911
Dick McAdams	2070 F (???)	Kalispell, MT 59901
Loren Kreck	Box 536	Columbia Falls, MT 59912
Richard Kuhl	867 N. Main	Kalispell, MT 59901
Don Gee	Rt. 1 Meadow Cr. Rd.	Kalispell, MT 59901
Gary Randolph	P O Box 11	West Glacier, MT 59936
Harvey Baskofski	15 Grace Rd	??
Jim Mayer	Box 49	Coram, MT 59913
Lena Longfield	Box 224	Kalispell, MT 59901
Ted Jenkins	140 Lower Valley Rd	Kalispell, MT 59901
Ron Cauthorn	Box 128	Columbia Falls, MT 59912

Bob Walker opened the public hearing at 7.00 p.m. He explained the purpose of the meeting was to gather public comment on the Snowmobile Grant Program Draft. He then opened the public hearing for verbal testimony.

Donald Kern: My name is Donald Kern from Kalispell, MT I've got several points I'd like to make #1) After reading the PEIS it is obvious that the Montana Department of Fish, Wildlife & Parks has no jurisdiction or authority whatsoever on federal lands The mere thought that they would try to propose or install snowmobile trails on federal lands without doing the required NEPA analysis an Environmental Impact Statement is preposterous. Categorical exclusions are not acceptable. All proposals must meet the requirements of NEPA. K-1

#2) Where is the enforcement of snowmobile regulations We have $471,000 being siphoned off of the State budget out of taxpayer's money focused on trail improvement, while there are numerous incursions and intrusions into roadless lands which have been documented over the last decade I want to know where the money for enforcement is going How come these people aren't being educated, being told to stay on the thousands of miles of roads and trails that are already available.

#3) No trails should be allowed in elk wintering areas, that included the Bob Marshall Elk Mountain unit and Columbia Mountain There have been many proposals for trails up there and I want you to know that I am strongly opposed to every one of those proposals. K-2

#4) According to MCA 87-1-201 (2), the Montana Department of Fish, Wildlife & Parks is required to "enforce all laws of the state representing protection, preservation and propagation of game animals." Obviously what you are proposing in this PEIS flies in the face of those regulations. K-3

#5) MEPA and Executive Orders 11-644 and 11-689 apply to all national forrests and require designation of snowmobile zones to "avoid and minimize harassment and/or disruption of wildlife habitats." Again, many of these proposals in the PEIS do not meet these requirements K-4

Lastly, I would like to say that I think this whole thing stinks of the Wise Use Movement and in reality all of this is very unwise and will ultimately be disastrous.

Ross Titus: My name is Ross Titus. I will have specific comments to make on the PEIS in my written comments but for now I would just like to say that after reading around 15 Environmental Impact Statements over the past several years, this one gives a more cursory and slap-dash treatment to supposed effects especially upon ungulates and grizzly than any EIS I've ever seen With one or two or three sentences, you discuss the literature and then you reach a conclusion, generally minimal or moderate effect on say the grizzly, and I think this is inadequate. In fact, I wondered after reading this why you simply didn't turn this project over to Yamaha and let them do the EIS because I think they could do as good a job of whitewashing the possible effects on ungulates, grizzlies and so on, and probably for no charge. I'll be commenting in detail later K-5

Dick McAdams: I was born here in Kalispell, raised here, my grandad built the road "going to the sun highway", I've surveyed with my grandad years ago this whole county. I moved back here, I do a little farming, I have a business here, I have a corporation, I snowmobile, boat, motorcycle and fly airplanes. For the last five years I've snowmobiled on the average of 4,000 miles in the short winters we have.

Air quality: Since I snowmobiled 4,000 miles - air quality - I feel slash burning creates more bad air quality than snowmobiles I can't think of any smog behind the mountains from snowmobiles

Soil: Snowmobiles do not use this area in early or late spring We were up behind Big Mountain the other day, we drove to the snow on a dry dirt road, unloaded the snowmobiles and we were actually on snow way up and did not see one animal or footprints, no grizzly bears, no animals at all

In here it says that there is snowmobiling in areas of insufficient snow cover. First of all snowmobiles really can't go on snow that is not sufficient. We have to go higher where there is snow that covers the stumps and rocks, etc. Windswept ridges, south facing slopes, you can't get a snowmobile there. Wet meadow areas, you can't get a snowmobile there K-6

Roads and Trails: My wife hiked the Bob Marshall from Marias Pass, 135 miles last year. She went into Marias Pass - it hit the papers - she hiked back and got lost and they picked her up with a helicopter. The trails were so worn by horses that in some places it was two feet deep. They couldn't walk the trails because the horses had ruined the trails. It was miserable. The dogs with their packs got lodged in the trenches, it was miserable.

Snowmobiles do not create areas that cause erosion of the roads.

Insufficient Snow Cover It is brought up here again for soil disturbance and gosh, you don't run snowmobiles down dirt roads. If you had to, about all it does would be to create two little tiny lines in the dirt from the ski skags. Most people are not doing that.

Wildlife: In the 4,000 miles a year the only thing I have run across is moose and you have to stay away from those guys. You stop and they look and you and then you let them go by. I snowmobile from my backyard and go up into the mountains 30-40 miles, the deer watch you go by. They stand there and watch you go by. Once in awhile they jump and run a few 100 feet, but that's about it. They just stand there We have never seen any grizzly bears. I've never seen any black bears or brown bears. I have never seen any elk. I'm assuming they are not tramping in the snow when it's 12-14 feet deep.

Noxious Weeds: I can't believe that the snowmobile would carry noxious weeds. A car or truck working a field driving up the road might carry noxious weeds in the summer time when the guys go up hunting, but not a snowmobile.

I think economic benefits to the State of Montana, there must be on the trails, the people we meet from Canada that come from other places to snowmobile here spend a lot of money in Montana. They bring money into our valley that benefits everybody.

Grooming: The groomer cannot groom unless the snow is deep enough. So in here it states about grooming, insufficient snow pack. You can't take the groomer up the trails unless there is enough snow pack. I guess there is 6 inches of metal around the track, you can't run that thing on dry or 1-2 inch dirt. You've got to have enough snow. So a groomer going up a trail is not going to hurt anything.

Aesthetics: I tell you, we go up there, the only way to get there and the only way other people can get there is a snowmobile. You don't see any skiers unless they come off of Big Mountain and they are out of bounds. Other than that, in 4,000 miles times 5 years, I've never seen a skier or a hiker in snow that is 4-10 feet deep Usually there is only snow cats and they are not walking back there.

Other Motorized Vehicles: Motorcycles can't operate when the snow is that deep. We don't snow cat around town unless it's our back yard.

Sound: When you get back in the country, often times we've lost our partner and it is hard to hear a snow cat unless the guy has too loud of exhaust pipes. And I think something should done about that. That is ridiculous to have loud exhaust pipes. Normally you can't even find your partner when his engine is running, so it can't be that loud Snow absorbs - he could be 400 feet from you and sometimes you loose a snow cat partner when his engine is running

Other than that I think we ought to keep the snowmobile trails going K-7

Loren Kreck: My name is Loren Kreck, I live in Columbia Falls. I must question the authority of the state agencies to institute an EIS, rather than the U S. Forrest Service The location of the studies will be largely on federal lands and should be the primary responsibility of the federal government which is especially charged with the management of the Endangered Species Act. K-8 The impact to the grizzly bear, the wolf as well as the ungulate population as their prey species will be affected by any decision made on the state level and would seem to be open to a court challenge. The ability of the snowmobile to operate at the altitudes and steep side hills where the denning female has sought sanctuary is well known to any observer. Late winter and early spring is the most vulnerable to the security of the bear and this coincides with most popular seasons for snowmobile operation in those high areas. Harassment would result in a critical life threatening expenditure of energy and unknown affect on the cub rate of survival K-9 The present Flathead National Forrest and most of the other forests in this state have been intensely managed with a network of roads, which by recent research, have resulted in major avoidance and consequent loss of usable habitat for both the bear and the elk during the denning and calving seasons and this extends into the later summer seasons for forage needs due to eroding. Are we to add the stress by extending the areas of impact by more motorized usage? It seems a contradiction of the present policy of forrest road closure now in affect. The preconceived notion that snowmobiles have minor or negligible impact, as written in the EIS, on wildlife does not have believability from all the biological authorities. Singular experiences or observations, notwithstanding the reluctance of an animal to run in late winter, may be due to extremely low vitality rather than the tolerance to the approaching human contact. Habituated animals react differently than wild counterparts. I would object to the expenditure of the very large amount of revenue from the gas tax being used to develop more trails for snowmobiles. In fact I can't see why a state agency is committed to a program of maintenance and construction of snowmobile trails when the machine itself is capable of 40 hp and the ability to make its own trails. K-10 This should be an alternative in the final impact statement and since public funds are utilized, the choice should be decided by the general public rather than predicated on the submission of certain interest groups as was the study described on page 55 where only the user groups were canvassed. Restrictions spelled out by NEPA and the federal executive orders if sufficiently applied properly which are not done at present could take care of this situation. K-11

Richard Kuhl I liva in Kalispell. I would take a quick moment to follow through here on a suggestion I made this afternoon that there ought to be a few more days allowed for written comments. To require written comments two days after a public hearing is a little short and I think there ought to be a two week period after the last open house or public hearing to allow people to send in their written comments.

I guess in general I would like to asy, as one who is interested in wildlife, that I don't think any activity, whether it be cross-country skiing or hiking or snowshoeing, etc , should take place in critical winter game range. I think you are looking at over the next 20-30 years in this valley in particular and the state in general, you will see more houses, more development, more activity of all kinds in areas that traditionally have been used as winter range by elk and deer and other critters. So anything that we can do to eliminate a possible source of conflict we ought to take. So I don't think snowmobile trails or cross-country ski trails or any other trails should be offically in place in any winter game range area. I'm speaking of identified winter game range not the general woods out there. K-12

On page 40 it talks about elk and moose using snowmobile trails to move from one feeding area to another. It struck me that if moose and elk could use those trails, perhaps predators of different kinds could also use those trails. There was no mention in the EIS about that so that K-13 might be e possible place to investigate.

On page 10 the issue was raised in the scoping on the program's impact on roadless areas. I believe that when people raised that issue they were talking about generally inventoried roadless areas not just designated roadless areas. So I think that the final EIS should look at the impacts of this program and especially the expansion of this program on inventoried roadless areas and especially in regard to the impacts on the future management designation of those roadless areas. Does the implementation of this trail program hinder, hamper or affects in any way the future classification of existing roadless areas for wilderness or some other roadless designation? I think that should be considered. K-14

On page 29 & 60 I was glad to see there was some effort being made to reduce the noise levels. I personally believe that 80% of the conflicts between folks that snowmobile and folks who do other things could be eliminated if we could reduce the noise at least a little bit. So I encourage the department to plow ahead with that effort and see if we can't get it down. It might be nice to have a better description of why the 78 decibel level was chosen rather than the 55 which was listed as a general outdoor activity. Is it because of public health or personnel who drive snowmobiles or people who listen to snowmobiles or was it an effort to reduce conflict? It seems to me that the draft ought to mention why specifically the 78 decibel level was mentioned. K-15

On page 28 & 33, in fact several places, it mentions that law enforcement money is short. So it seems to me that if law enforcement money is short and perhaps mitigation money is short in implementation of this program or especially the future expansion of this program, that it ought to be made part of the review criteria in Appendix A that whenever a mitigation measure is mentioned or law enforcement is mentioned to a mitigation measure, there ought to be another box saying sufficient funds exist to fund that particular measure. K-16

On page 55 the public perception of snowmobiling was mostly documented by comments of snowmobilers themselves. Well, it does strike me that it is not a very objective way to go about it and that it needs more reliable data or if reliable data doesn't exist, then maybe the whole thing ought to be eliminated. K-17

On table 4-2 on page 102, terms like "short term, long term, minor, moderate, negligible, etc.," are used and it does seem to me a more precise definition should be given. Exactly what is "short term, long term, minor," does it mean we loose 5 elk, or ½ an elk, or we loose 0 elk. It seems to me that some criteria should be used. If no quantitative standards exist, or if they can't be clearly stated, then it seems to me that it should be recognized in the document that the terms being used are subjective descriptions based upon the professional opinion of the department and the writers of the EIS and that it is impossible to quantify these kind of data. Also there ought to be some recognition that while you might have state-wide minor, negligible, or whatever those terms mean, that in specific local instances, the impacts could be touch more severe. K-18

Finally in Appendix A, it states that for the proposal which is reviewed in accordance with requirements for those trail proposals, which need to be reviewed in accordance with the environmental review criteria, needs to be clearly stated. We had all kinds of discussion that lasted at least an hour or more this afternoon in the open house about whether present day trails are going to be reviewed under this document or are not going to be reviewed under this document, so somehow or another you ought to be able to state which trails programs are going to be reviewed under this program and which are not. K-19

Finally, the checklist in Appendix A lists many review criteria and the required action necessary to be completed for e proposed action, but frankly there are very few boxes listed that say this is kind of a dumb idea and maybe we ought to eliminate the project. It seems to me that we go from mitigation measure to mitigation measure and at some point in time not every proposal coming into the department is going to be good idea and there ought to be some place on that checklist where either something adds up or it occurs to somebody that this project is not going to fly and there ought to be a destruct button or e destruct box that you check off and say "ok, sorry folks, this is one that was a bad call." K-20

Don Gee: My name is Donald Gee, I'm from Bigfork. I'm against more snowmobile trails and off-road vehicle trails, especially in wilderness study areas. When I go into the back country I don't want to hear or smell gasoline engines. I think most people feel the same way. You are promoting and spending money on things that most people don't want. K-21

Harvey Reikofski: My name is Harvey Reikofski, I live in Columbia Falls, Montana. Under the proposed and preferred alternatives, past and present use of groomed snowmobile trails is being threatened by the arbitrary process that the DFW&P proposes to use for future management of the Snowmobile Grant Program. The process to be used would institute negative actions with no provision for public involvement or input. No process for public opinion or review is e significant and detrimental exclusion in this document. The PEIS centers on mitigating for grizzly bear habitat with seasonal closures and restrictions but again is arbitrary by not providing specific mitigation measures to take place in proven occupied habitat only. This is in light of the fact that many areas have recovered bear populations that did not require such excessive measures in the past. Negative mitigative actions also could include avoidance of off road play areas which could be claimed by non-motorized recreationists with no actual documentation of prior and exclusive use. The historical use by the snowmobiling public and sometimes exclusive use by them could be disregarded by a document supporting a management process which centers on catering to the non-motorized public. This policy disregards compatible and more popular use as proven by the number of snowmobile users in contrast to any other winter user group. K-22

Some of the areas used by snowmobilers could be classified as historical by the 30 plus years of use by the same. This use could also be defined as cultural because of historical use by families who utilizes these areas for many years and the use became their culture. Avoidance of areas with summer wetlands and/or alpine tundra with minimal snow cover leaves the door wide open to restrict access to many high alpine pley areas. Without an indication as to what is acceptable snow cover to protect these areas, the PEIS is biased toward an open ended policy of restricting off-road use by snowmobiles. K-23

Proposed increases in management personal to implement the changes proposed would unnecessarily burden the underfunded program as more money is required to pay for management overhead. With less money for on-the-ground costs of grooming, the FW&P's sets itself up as a nearly out-of-control bureaucracy that looses site of its original intent and goals and side steps the public who choses them to manage and enhance the grooming program. This testimony is submitted on behalf of the Flathead Snowmobile Association and its 400 plus members. If we were to chose an alternative, we would go with Alternative #1. K-24

Tom Longfield: My name is Tom Longfield. I'm president of Montanan's For Multiple Use and I would like to submit this testimony into the record.

I'm submitting this testimony on behalf of Montanan's For Multiple Use, a non-profit organization who represents over 1500 multiple users. A large number of our members are avid snowmobilers. The majority of snowmobilers use groomed trails to access high alpine ridges. It is necessary to continue with the groomed trails as many traditional areas have been lost to motorized recreation because of road closures and additional wilderness areas. We are concerned with the statement in the PEIS summary on the impacts on wildlife. Studies generally conclude that snowmobile activity has limited impacts to ungulate habitat and population distribution, however, it could result in unnecessary stress and energy expenditure by the animals at inopportune times of the year. The amount of activity of snowmobiles on groomed trails is much more limited than what Yellowstone National Park has. With viewing pictures, films and talking to people who snowmobile in Yellowstone, this does not seem to be a problem. A host of Yellowstone's wildlife does not seem to be bothered with the presence of snowmobiles. Evidence of wildlife being disturbed should be based on scientific facts and not assumptions. K-25

It was also stated in the PEIS "grizzly bears could be impacted if late season snowmobile activity is to ungulate wintering areas where bears commonly scavenge for carcasses upon emergence of hibernation." Again is this an assumption or is it based on scientific facts? We know of no groomed snowmobile trails in ungulate wintering areas. To our knowledge these areas have always been off limits to motorized recreation. Furthermore many areas currently have recovered grizzly bear populations that would not have recovered if snowmobiling showed negative impacts. K-26

Impacts to vegetation would be highly unlikely and should not even be considered as a major concern in the PEIS. The spread of noxious weeds also should not be a major concern. If a noxious weed problem somehow develops, then a weed control measure should be implemented at that time. Most snowmobilers do not ride their snowmobiles off the snow as this could damage their machines. If some windblown areas are considered a problem, these should be dealt with on a site-specific basis not programmatic. K-27

There should not be a problem with non-motorized recreation being impacted by snowmobiling. In fact, many cross-country skiers have benefitted from groomed snowmobile trails. The State of Montana has over 3 million acres of wilderness which allows non-motorized recreationists the solitude and protection from motorized recreation disturbing them. Here in the Flathead Valley we have 1,070,000 acres of wilderness and over 1,000,000 acres in Yellowstone National Park for non-motorized recreationists.

Snowmobiling is crucial to many communities in Montana to provide economic benefits to carry their business through the winter months. We must ensure that snowmobiling remains a custom and culture in the State of Montana. Montanan's For Multiple Use encourages the Montana Department of Fish, Wildlife & Parks to continue working with the snowmobile groups as well as other multiple use groups to ensure motorized recreation will continue for all to enjoy.

Thank you for taking time to hear this testimony. Please keep us informed of the outcome of the PEIS. K-28

Peggy Wagner: My name is Peggy Wagner. I'm from Hungry Horse and I've lived there for 30 years. I would like to clarify that I am with the Multiple Use Organization and I'm not with a Wise Use Organization.

Snowmobiling is a family experience that we have enjoyed for generations. We have two children, 9 years old and 11 years old, that are really looking forward to the recreation that we've experienced when we were children. We also have a foster daughter that is married and has two step children and they are in the process of learning how to snowmobile and it is a very exciting experience for them.

According to the Flathead National Forrest, 77% of the recreationists on the forrest are motorized recreationists. A variety of the people who snowmobile include and are not limited to the handicapped and senior citizens. These are people who otherwise could not access these areas even in the summer months.

Air Quality: I do not believe is a problem now days like we had 10 years ago. The restrictions that have been put on the snowmobile have, if anything, improved the air quality. K-29

I do not believe that this is e detrimental thing to the grizzly bear. They are in hibernation the majority of the months that the snowmobiler are out there. When they do leave the areas in the spring time, they do not stay in the high alpine peaks where there is a lot of snow. Not only that, but in the Southfork according to FW&P documents, we have a recovered grizzly bear population in the Southfork. Why, if snowmobiling has been detrimental to these animals all these years, why all of a sudden is snowmobiling terrible to them? I don't believe that is possible. K-30

I see no impacts on the wildlife in Yellowstone where the bison and the elk and the deer stand beside groomed trails showing no effects. Scientific facts and not "maybe's, might's or could be's, or assumptions" should be used. Each area should be treated as site specific and not programmatic. The east side of Montana is totally different from the west side. K-31

Snowmobiling is beneficial to our local communities and brings in the tourism that a lot of the people who object to snowmobiling believe that this valley will survive on. The northwest needs this economy. This valley cannot live from the income of Big Mountain alone. These are public lands for all varieties of the public to use. There was mention in the PEIS that there could be a conflict with mining and logging operations. Logging and mining corporations have worked with the snowmobilers in the past with great cooperation.

We have wilderness areas - we have the Great Bear Wilderness, we have the Bob Marshall Wilderness, we have the Mission Mountain Wilderness, we have the Scapegoat Wilderness, we have the Jewel Mountain Hiking Area, we have Glacier National Park. I believe that we need a balance. When 50% of our forrest is wilderness right now that is restricted to snowmobiling, I believe that we should leave the areas that we have now open for snowmobiling. That is all we've ever asked for is a balance.

I say no to Alternative 2. And if I were to choose an alternative I would choose Alternative #1. I do not believe in total lockout.

I would suggest that anybody who objects to snowmobiling should give it a try - it is e great experience. You never know, they might get hooked.

Sharlon Willows: I'm a NEPA cultural and transportation paralegal from Hungry Horse. The first point I want to make is that this PEIS where state parks has no authority on federal lands in the first place. This document, I feel, is a fraud. An overt political scheme to circumvent the National Environmental Policy Act and directly applicable federal orders such as # 11989 that directs federal agencies to avoid and minimize harassment or disruption of wildlife habitat. Parks division of FW&Ps has erroneously presumed authority it does not have in state statutes. There is plenty of areas outside designated elk winter ranges to perpetrate some of these ideas. K-32

This PEIS, I feel, unduly presents a scheme to make new commercial trails on federal lands and categorical exclusion, which means it is exempt from NEPA review, this cannot apply to threatened elk winter ranges. K-33

This PEIS arbitrarily attempts to conclude that new commercial trails will have "minor and negligible impacts on wildlife, air quality, soils, erosion, riparian and winter habitats and noise in the short term and the long term." Recent applicable research demonstrating adverse impact on the wild vulnerable elk has been omitted from consideration. This PEIS uses outdated 1970's primarily and incomplete scientific research to make its arbitrary and incredulous conclusions of negligible and short term and long term impacts to ungulate habitat behavior and populations. And again, discusses other recent 1980's research that will be made available to you during the comment period

K-34

Research shows that this PEIS process failed to consult entirely with Region 1 and Region 4 divisions of FW&Ps. The vulnerable elk and threatened winter ranges of the Bob Marshall Elk Management Unit cannot be included in this bogus programmatic environmental impact statement that is based on assumptions for the habituated elk of West Yellowstone. This was brought up in scoping and ignored entirely in the PEIS.

K-35

I would like to address now what I feel to be the alternative section of this PEIS. It is entirely inadequate. Point A - Alternative A: the existing program does not equal no action under CEQ guidelines. Thus far the existing program has been promulgated by the Forrest Service without application of NEPA or applicable federal executive orders where 90% of this program is on federal lands. Now this PEIS deceptively attempts to establish new trail development on federal lands as "minor and negligible environmental impact and/or exempt from NEPA process" a condition called categorical exclusion discussed in Appendix A. I strenuously object to this plan to circumvent federal law.

Alternaove 2: the legislative discontinuance of this existing program is unreasonable and should be eliminated. We can all agree on the existing program, I am sure, within the constraints of federal law on federal lands.

Alternaove 3: is a bogus process without authority that seeks to replace and violate NEPA procedures with an alternative review committee process.

Point B - Under NEPA law when the Forrest Service is "involved in an action it must be a joint lead agency". This PEIS violates NEPA's joint lead agency regulations. A supplementary draft PEIS is required where the Forrest Service appropriately participates as a joint lead agency

Point C - This PEIS unjustifiably disregards a reasonable alternaove such as spending grant money on enforcement. Enforcement duty can be presumed under state statute "promoting snowmobile safety." The PEIS is deficient because it fails to consider a program where rich out-of-state snowmobilers should pay a decal fee for use of Montana's public lands. This would create needed sources of administrative funds similar to out-of-state hunting licenses.

K-36

In conclusion this plan does not apply to elk winter ranges of northwest Montana. And that was pretty much determined this afternoon where yourself could not come up with an authority under which this PEIS was promulgated. The PEIS fails to consider direct and cumulative effects on the wild vulnerable elk of northwest Montana. The PEIS fails to disclose that winter ranges of the Bob Marshall Elk Management Unit are already threatened by human impacts and encroachment. The PEIS preferred alternative is an unauthorized process to replace the NEPA process

Steve Thompson: The last table in the draft PEIS for this Snowmobile Grant Program I believe reveals the true purpose of this exercise. It shows that all hell will break loose if we don't keep the program going and expand it and if we do expand it, we will have negligible impacts on just about every issue raised. However, if we discontinue the program it will have major impact on things like wildlife. I don't think that is supported by the document. I think there is selective nondisclosure of information that leads to that sort of conclusion and what is left is the perception that this is basically an exercise in bureaucratic self justification.

The most glaring in the draft PEIS is the section on perceptions of the Snowmobile Program. This section suggests that anybody who matters or at least anybody that the department bothered to ask, loves snowmobiles and the state's program. However, a recent random survey of 2,000 Montanans commissioned by the U.S. Forrest Service suggests otherwise. It should be noted that this survey is the largest random state-wide survey in recent Montana history on resource and forrest issues. The survey by A & A Research of Kalispell found that 70% of Montanans disagree with making more areas available for motorized recreation. For most of the forrest surveyed the vast majority of those they surveyed strongly disagree. This result doesn't pertain to expanded snowmobile trail grooming per se but it does indicate public attitudes toward loud, fast moving machines in the back country. To 70% of Montanans the snowmobile program is not as benign as this PEIS suggests. I have no problem setting aside part of the forrest for snowmobile trails, what angers me however is the attitude by some folks that they have a right to race their machines in every drainage they can get to and that anyone who disagrees is trampling on their rights. The majority of the public does not use motorized back country vehicles - I should mention that if most people do use motorized vehicles that includes driving to trail heads to go hiking, or something like that. I don't consider driving on roads to get from one place to another qualifies as recreation medium. But most folks prefer peace and quiet when they are in the back country. It can be both aggraveting and scary when you're cross county skiing on an old road bed and a band of snowmobiles role past at 40-60 mph. It also aggravates me that snowmobilers in the Flathead say that they are not interested in multiple use lands that have been extensively logged and roaded like in Talley Lake or the Island Unit. They want pristine roadless areas and proposed wilderness.

K-37

Some of my detailed comments are.

Wildlife. I want to deal with the conclusion that wildlife will be more impacted by on groomed trails. I think this is faulty logic. Trails allow quicker access to a broader range of play areas allowing snowmobilers to cover a much greater distance during the day. There is no evidence that trails discourage unregulated off-trail use. In fact, they expand the opportunity to get off trail in many more places. It was suggested in a newspaper article yesterday that if we don't have the trails, people will go all over the place. I would say that they are getting there anyway, which isn't necessarily a problem, I just think it is a bad conclusion when you can go up to the Ten Lakes and cruise 30-35 miles on a groomed trail at 50 mph you get there real fast and then you can go up and play in the alpine basins. It is not an "either/or" proposition.

K-38

I recently heard of a news report on Yellowstone bison that indicates that bison winter travel and grazing patterns have changed over the years because of high snowmobile use. I haven't been able to locate the study and I would like to see it discussed in the final EIS. Despite this finding, I would say that Yellowstone is a poor model on wildlife. Yellowstone elk are "zoo-like" all year around and I don't consider them real elk compared to elsewhere in Montana. Studies on elk and snowmobiles in Montana tell us nothing except about elk and snowmobiles in Yellowstone. I also note that the studies cited are contradictory on whether big game become habituated to loud mechanized activity. The comment about big game showing more flight response to skiers than snowmobilers, even if Yellowstone and other studies are accurate, should not be used to justify a negligible impact determination. Snowmobiles typically

K-39

cover ten times the territory as aggressive cross-country skiers and the long-term range of the motorized, the whine of the motors expands the impact zone even further. Additionally snowmobiles are even more likely to penetrate areas where wildlife are not accustomed to human disturbance in the winter. A trippling of the heart rate in deer cited in the EIS from snowmobiles seems to be a significant impact if the deer is subjected to a steady stream of motorized harassment.

K-40

Fur bearers are also more vulnerable when trappers access to remote back country is increased by snowmobile use. The population drop of species like linx may be in part due to increased snowmobile access. I think that is one component in addition to others and that is not discussed in this EIS.

K-41

As far a grizzlies go, this just says that the only impact is when grizzlies come down into ungulate winter range to eat on winter kill carcasses and as Peggy noted there is really that much - there is not suppose to be snowmobile in elk winter range - then you don't have a problem. The Southfork Grizzly Bear Study is showing that cubs with sows which are the most sensitive and the most needy of security, hang out around their den for two, three or four weeks upon emergence. They don't just go cruising down to the low country. The males do. The females with cubs stay up high, stay around the den, see what food they can get, or just hang out, to the cubs can get their feet around them, they keep returning to the den. That is a very vulnerable period. That is indirectly affected by groomed snowmobile trails assuming groomed snowmobile trails don't go up into denning habitat which I think is mostly the case, because as I said earlier, groomed snowmobile trails can get you into a wider range of back country play areas faster. So if there wasn't groomed snowmobile trails, maybe they could get up into a couple of high elevation drainages but with groomed snowmobile trails they have a whole range they can get up into just because they can get down there that much faster

K-42

In the Ten Lakes there is 30 miles of trails that provides easy access into alpine back country. The groomed trail wasn't enough. Somebody cut an illegal swath up into the wilderness study area off of the groomed trail. I've talked to a Fish & Game biologist who have flown over the area in their regular spring tracking and they have found areas where grizzly bear tracks are covered up by snowmobile tracks. That has happened elsewhere. There may not even be direct conflict, hopefully the bears will avoid it. But up in the high country where you can get up onto the set up snow, that is where grizzlies might just be hanging around a den.

Just generally, I would say that the indirect effects, such as that, are not adequately dealt with in this PEIS.

K-43

I think there needs to be more emphasis on law enforcement. $17,000 state wide just doesn't cut it. And mitigation shouldn't be just signs and public awareness. In order to instill public confidence and to make the program work, there has to be a well coordinated and aggressive law enforcement program. When we have yearly, well known violations of the Jewel Basin closure and it just happens, that doesn't lead to very much confidence in expansion of a snowmobile program amongst the general public.

K-43

I think that new grooming proposals for new trails or expansion into new areas, that there should be public review of those proposals to the state in addition to any NEPA work that the Forrest Service does. If the state is considering requests from clubs to do that, then the general public should have a chance to know about that and to consider it on the same track.

K-44

I would reinforce the comments that this should be a joint project with the Forrest Service. Anything that the Forrest Service does on a site-specific level can't be tiered to a programmatic EIS unless the Forrest Service was jointly involved in preparing this and it goes through the NEPA procedure.

K-45

Jerry Randolph: My name is Jerry Randolph. I'm a resident in West Glacier. First of all I appreciate the opportunity so have this public hearing and also to have the opportunity to speak at such a hearing. I have concerns about this PEIS relating to the State's Snowmobile Grants Program. First of all NEPA and EO 11644 & 11989 have been ignored. There is need to implement and follow federal mandates on federal lands.

K-46

#2. The 1992 State Elk Management Plan has been ignored in this PEIS. Specifically, this plan conflicts with the MDFWP's duty to "enforce all the laws of the state respecting the preservation, and propagation of game animals." MCA 87-1-201(2). New reliable studies have not been fully considered in the PEIS.

K-47

#3. By law this proposal has no authority relating to federal lands. Furthermore, the Forrest Service must be a joint lead agency when involved in an action such as this PEIS.

K-48

#4. There is need to protect what is left of existing wintering ranges and corridor passages for animals. More and more of these wintering ranges and corridors are drastically being reduced.

#5. Lets have funding go towards on-going scientific research, increased enforcement, legitimate snowmobile education, and more education towards people's impacts upon sensitive areas.

K-49

Carol Pike: I'm Carol Pile and I live in Columbia Falls and I'm the Executive Director of the Chamber of Commerce in Columbia Falls. I have lived in Montana all my life. I lived in the Flathead Valley for the last 35 years. First of all I would like to say that I am not a snowmobiler. I am a down hill skier and a cross country skier. However, I believe that snowmobiling is a very important part of extending the season and of the economic base for Montana and especially for northwestern Montana. More and more we have 2.2 million people that came to Glacier National Park last year and we ask more motels, more restaurants and facilities for tourism and at the most your park has people who come to it for 4-5 months. Those people have to have some wey to extend their season. For my Chamber, which extends from Columbia Falls to the West Glacier area, we have been promoting snowmobiling for the last 4 years to bring in outside dollars as well as to help the local snowmobile areas. It is working very successfully. Today I submitted letters from 8 individual businesses which took the time to write letters explaining to you the importance of the snowmobiling economy when we are suppose to be looking for other alternatives to logging and possibly the aluminum industry and that type of thing. We feel that snowmobiling can help us diversify some of our economic base.

We support snowmobiling as a good, clean family sport. It allows everyone to be able to enjoy the beauty of our area and by everyone we mean, young, old, the handicapped, and as people have stated, this is sometimes the only opportunity that they have to enjoy the beauty of northwestern Montana. We believe that it must be properly guided and we feel that both the Forrest Service and the Fish & Game working together have done a good job of this.

In order for us to promote it as a destination for tourism, for people to come in and bring their outside dollars, which conservative roll around 3-4 times, we need to have a groomed snowmobile network. Other snowmobilers are able to go where it's ungroomed, however, when you have people that come in they must have the groomed trails.

K-50

We believe that it has a very low impact on the environment because of the protectiveness of the good snow on the ground cover. Other states with many years of vast snowmobile trail systems have found that there is very little negative impact on animals and in some cases has helped the animals during a very hard winter. Snowmobilers enjoy the great outdoors and quality of life in Montana and they also want to preserve the quality of life that we have.

K-51

We strongly support Alternative #1

Bob Pellett: My name is Bob Pellett from Cut Bank, Montana. I have a number of things that I would like to address this group about.

#1. First I would like to tell you that I read every word of the 200 pages so hopefully I won't make too many mistakes in my presentation. I would like to make a few general comments. I find it astounding to read every word of a nearly 200-page document on environmental impacts of a national recreation program and find only one page of positive comments which turns out to deal only with monitory and job returns. In that case I would like to suggest that there are some following impacts that we did not consider on the positive side - I will submit this paper to you at the conclusion of this meeting. (Written comments handed in.)

K-52

Bud Biegler: I'm Bud Biegler from Cut Bank, Montana, and I'm an avid snowmobiler. In reference to this testimony in support of snowmobiling, it provided family enjoyment, recreation. It involves and generates responsible present and future citizens. It's a family sport that all of us can enjoy being sound limb or not. Another point, the financial state that our state is in, snowmobiling, I feel, generates many funds to enhance the economy, and given a chance to grow, can be a large part of our future in this state. I feel it is a real area for this. I do feel snowmobilers respect the environment and as far as impact to wildlife, I've studied the thing at Yellowstone and I find no place where snowmobilers are causing any impact to the wildlife in that area.

K-53

If there has to be an alternative, I would support Alternative #1.

To the same thing, I support multiple use and I see that there is room for all of us.

Bob Walker adjourned the hearing at 9:00 p.m.

MDFW&P Building
Helena, MT 59601
4/29/93 7:00 p.m.

H

Those Present:

Ellie Arguimbau	17 Division	Helena, MT 59601
Ray Smith	Box 231	East Helena, MT 59635
Beverly Magley	805 S. Rodney	Helena, MT 59601
Gordon Thompson	1027 N. Jackson	Helena, MT 59601
John Gatchell	15 Jeffus (?)	Helena, MT 59601
Don & Veran Hand	815 E. Center	Dillon, MT 59725
Mike Vashro	1204 Sorrento Rd.	Helena, MT 59601

Bob Walker opened the public hearing at 7:00 p.m. He explained the purpose of the meeting was to gather public comment on the Snowmobile Grant Program Draft. He then opened the public hearing for verbal testimony.

Ellie Arguimbau: I live here in Helena and I'm primarily a cross-country skier. I have snowmobiled a few times and I have no problem with snowmobiles in their place. Around the Helena area there are very very few places that are good for skiing that are closed to snowmobiles. There are many areas that are not particularly encouraged by being part of the snowmobile trail system, for instance Stemple Pass which is probably the most popular ski area, it's open to snowmobiles. Now this sort of seems to be a gentlemen's agreement that snowmobiles generally don't go there because I very rarely see one up there. But I do see their trucks and I know that they are allowed there. A couple of years ago I start of getting sort of bored with the few areas I could ski that were not open to snowmobiles, so I started going on some of the snowmobile trails on my skis. I skied up around Mullen Pass and particularly this winter quite a few times up above Rimini, and I was really shocked to find that with all this spending and this huge budget that is promoting snowmobile use, I saw almost no snowmobilers. I couldn't believe it, here I was on a groomed designated snowmobile route, 15 miles from Helena, and I saw one group of snowmobilers the whole day. Another time I went out, I saw maybe two groups of snowmobilers. It seems to me that there are adequate snowmobile trails existing already because the use just isn't there. You go up to Stemple Pass and you see 50 skiers on an average day. You go up to Frontier Town, you probably see 100 skiers all jammed into one area because they don't want to go where they will run into snowmobiles. You go out on the snowmobile trails and there is practically nobody. There just isn't that many snowmobilers. They are very vocal and they are very well financed, so it makes it appear that they are a very large segment of the Montana population. They are not, they are a very small minority. The people who like to use their God-given feet to recreate are the huge majority. The people who like to sit on their rear-ends and rev up their power, are a very small minority. So I think that it is very short sighted to be devoting this much money to promoting new trails in new areas when there just isn't the use.

H-1

Now I haven't been able to read the impact statement and I've just glanced through it now, and I didn't see any maps that show where these proposed snowmobile trails are going to be. Rumors are rampant. The rumors are that they are going right up to the edge of wilderness, that they are going to be going into wilderness study areas, and I just think that it is absolutely unconscionable. To promote snowmobiling right on the edge of wilderness is saying basically "we are going to turn the other way if you actually go over the boarder, we aren't going to worry about that because we are promoting you going right up to the edge." I think any area that is under study for wilderness or is being proposed for wilderness, we should not build in new possible conflicts. Until it is decided that these areas are actually going to be wilderness, we should not establish a snowmobile use in those areas. It is just going to cause grief in the future.

H-2

Beverly Magley: I wish to submit mine in writing. I would say that I am vehemently opposed to any trespass into wilderness or wilderness consideration areas.

Gordon Thompson: I'm Gordon Thompson, Helena, Montana. I'm a cross country skier and a non-motorized user other than an automobile down the interstate. I just have a little short note that I'to going to read here.

More areas along with the spending of more tax money for motorized recreation, I as a taxpayer am against. It is not just money alone that I consider, the increasing motorized recreational activity are also hastening the decay of our so far unroaded areas. These things need not happen if our love of materialism and easy life weren't so obsessive. This form of pleasure seeking would not increase the request for new places to motor, we wouldn't be spending more and more tax monies funding this expensive, destructive mode of having fun. Too much leisure time along with too much of someone elses money yields degeneration. Read a history book some time and just see if this hasn't been the case in all 13 chapters. So lets not open to motor vehicles or traffic of any kind on the Ten Lakes, the Badger Two Medicine, Crazy Mountains and others that are not so far being used. The Park's department and other government entities, in promoting opening of these areas to motorized use, is only hastening the decay of our so far yet undisturbed landscape, little of which remains.

H-3

John Gatchell: I appreciate this opportunity as far as I know it is the first opportunity that Montanans have had to actually address this program on public record. So I would like to submit some comments on behalf of the 2600 members of the Montana Wilderness Association. Our members have keen interest in management of the national forrest that are affected by this program and when this program began I don't think we had too much problem generally but over the years we've seen it driven into areas where there are problems.

I think one thing that is dismaying to many of our members is to learn that a portion of our gas taxes that are payed by all Montanans are used to promote exclusively off-road vehicle or powerboat or motorized recreation. I think the final EIS, this may be outside the scope, but I think the scope needs to be expanded to some degree to include the failure of the state at this point, and that may mean we need legislation, to address the needs of the other Montana non-motorized trail users which according to the department's data are quite easily the majority of trail users. For example not quite twice as many Montana residents are cross country skiers than snowmobilers. But the trails program doesn't spend, to my knowledge, a dime to maintain cross-country ski trails. I think it would be appropriate in this document to consider this even if the answers may be changes in legislation.

H-4

Everyone has to pay into the state gas tax which is a major source of funding other than the decal as I understand it. This is a state funded program but the decisions about where to locate trails are made primarily by department officials and the Montana Snowmobile Association. There are many more Montanans that have a legitimate stake in that decision that in fact should be included in making those decisions. I think that could remedy most of the user conflicts that exist in the current program let alone an expanded program.

H-5

Our members strongly object to using state funds to promote off-road vehicle use into roadless lands, key wildlife habitat and wilderness study areas as the current program does.

H-6

The department and the Forrest Service may in fact be violating the law if there are not evaluations for off-road vehicle trails being funded into these sensitive areas.

We strongly object to the proposal in the back for a categorical exclusion from compliance with the law proposed to the document. By that I mean specifically for current trails that go into roadless lands or lead - for example as the Ten Lakes trails do - right to the edge of the wilderness study area and obviously create trespass problems. There are similar problems in the Absorokee Beartooth. Again, there is an increasing amount of trespass in the area and I think that needs to be addressed.

H-7

There are over 30,000 miles of roads on Montana's ten national forests, something like 33,000 miles. It seems to us that is adequate room, plenty of room and most of those are in snow country for snowmobile trails without having to push conflicts into roadless lands or wildlife range or study areas. Yellowstone Park currently receives something like 40,000 snowmobile visitor days per year and yet it doesn't permit off-road travel. I think if you stick to the roads, you would avoid many of the conflicts. To do that I would advise that we change the makeup of how these decisions are made to bring in some of the other users that have a legitimate stake for the first time.

I think too that some criticism of the PEIS, although I think it healthy for the first time that we at least have a chance to look at this program instead of having it just happen and then going out skiing and finding problems, it would be a lot of better if we could pinpoint specific problems but there is not a single map in here that is useful in terms of identifying exactly where the trails are. I think the key to avoiding conflicts is that kind of site-specific analysis rather than a map the size of a state highway map. I think that those good maps should be in the final EIS. I noticed that the agreement for each of these trails includes a map attached. I would suggest an appendix that includes each one of those maps so that the people reviewing it can actually evaluate whether there is a conflict or whether there is not a conflict.

H-8

In addition to some basic information that should be included, I've never seen an EIS that had so few alternatives. I don't know why, for example, there wasn't an alternative that evaluated not having trails groomed or marked into roadless areas, sensitive wildlife habitat wilderness studies, or to the edge thereof. Again, I think there is plenty of room and I think you should include alternatives like that. Not just include them but actually seriously consider them. In fact, that should be a preferred alternative. I don't know if that just reflects the problem I talked about before where its been a program that hasn't really, until this point and I do appreciate it, had the input of other users. So naturally it's a conflict. I think some of these legitimate conflicts and issues really need to be dealt with rather than swept under the rug.

H-9

Some of the other speakers have already addressed the point and I won't belabor it, but in recent surveys of Montana residents 70% of people disagreed with making more areas available for off-road vehicle recreation including snowmobiling. It doesn't mean I think we shouldn't have areas for that kind of use, it means that you need to start paying attention to the

H-10

rest of the public and start balancing those needs. Those figures really reflects some of the data that is compiled both by FW&Ps and the National Forrest in terms of use data. Most people, I think, prefer quiet trails and we need to maintain quiet trails. H-11

Don Hand: I'm the Executive Director for the B & Red Snow Riders (???) a Trail Grooming Club out of the Dillon, Montana area. A quick note on some earlier comments. We service not only the snowmobilers but the cross country skiers as well as maintaining and grooming their trails in our area. We have several roadless areas which border on, as matter of fact our trails are the border and defined as the border for the roadless areas. We get along quite well with all of them.

As far as the EIS goes, we agree with Alternative #3 for the most part. There are a few places which rather interest us because of the additional manpower that will be required but most of it is quite good. On page 2 it makes reference to a $6 non-residents, temporary use fee. This was kind of a surprise to me because I had never heard of that before. Apparently it has been intact for some time.

Figure 1-2 is a map of the trail systems towards the front of your book. Our particular trail system is not correct as shown there. It is much more extensive. We go from the Idaho border, encompassing two additional clubs, we can get you into Fairmont Hot Springs on a snowmobile trail if you would like to go there. Over 95% of it would be a groomed trail.

This EIS statement has been quite good in supplementing the traditional handbook that we use that governs the snowmobile program. It adds a lot of the administrative detail which has been lacking. H-12

At present we find enforcement dollars are too short. Under the preferred alternative we need some way to fund enforcement better than we do now so that we can allow for more active participation by the law enforcement community, not only the Fish & Game Wardens, but the Sheriff, the Highway Patrol and others. H-13

You'll find that most of the clubs have a high amount of volunteerism. I see in the EIS there are many statements saying we'll have to add additional people in the form of a review board for sound and basically air pollution controls, - we currently have one for safety and education at present and the program works quite well and is quite efficient for us - but as we go along preparing wildlife clearances, EA's, etc., many of us who don't have training are going to be required to have some additional help probably from the department. So it may be incumbent upon the department to help us out on the occasions we need up. Most of the Park's managers at present are heavily overloaded. H-14

A quick recap: we believe the EIS as written is quite adequate and it explains ___________ quite well and defines any areas that we feel may or may not have been a conflict. We agree with preferred alternative #3. H-15

Ray Smith: I've been a snowmobiler for approximately 20 years and after listening to some of the people talk about it, I personally in just riding on the trails have saved 7 cross-country skiers lives, just being out there. The lady mentioned that there is practically no snowmobilers and there were more cross country skiers. I would dispute that any time she wants to do it. She has apparently been out there on days when there has not been that many people out. There is room for everybody. Hey, there is all kinds of room out there. One place like the Garnet Range over there out of Drummond, the trails are designated for cross-country people, for snowmobilers, and everybody goes out and has a great time. There is not problems at all. There is all kinds of room out there and I just can't see where there's any dispute. We've got a big country and everybody can use it. Just because you like a particular thing, everybody else has to quit and join you? No. It just irritates me a whole lot. I enjoy my snowmobiling and I hope that people enjoy their cross-country skiing. I may do it sometime, but I hate somebody to say on, no way.

Another thing about wilderness areas - where are you going to draw the line? Do you want a buffer zone? This doesn't make sense. Why couldn't a snowmobiler go up to a line? Snowmobiles don't scare game even near as much as a cross-country skier. So if you're thinking about that, I can take you out and show it to you any day. H-16

Mark Shapley: My name is Mark Shapley and I live here in Helena. My main comment concerning the PEIS you've heard already, but I want to reiterate it. The narrow range of alternatives or the few realistically considered alternatives I think is a real weakness of this document. Particularly considering what Montana has been going through the last few years in terms of public lands debates over wilderness designations and the management of wilderness study areas. I think that it is hard to view this PEIS as adequate without including an alternative that steers this money away from roadless lands that have been proposed for wilderness about which the debate continues. I don't think we have any business spending tax money that we all pay through the department to distort the wilderness debate by encouraging new motorized use in roadless areas. I think you could make the whole analysis and document a lot stronger if you would develop that as an alternative in the final EIS and give it serious consideration. H-17

Greg Chance: My name is Greg Chance and I'm from the Helena area here too. I've really changed my thinking about snowmobiling. I was adamantly opposed to it at one time, and I have a couple of friends that do a lot of snowmobiling - I don't have any problem with it. I guess the biggest problem I have with this proposal is hearing the kind of budget shortfalls that we have - we don't have money to operate state parks and money to do this or money to do that - it really bothers me to see us spend the money to promote. I don't think we need to spend the money to build trails for cross-country skiers either. I think people would be just fine with what they have. This gentlemen here had a really important point when it comes to off-road use whether snowmobile or motorcycle, or whatever, it seems that one of the problems is with enforcement. It seems like when I talk to people about enforcement, it always comes down to budgetary issues. We don't have the money to do it. I haven't had a chance to read this EIS and I don't know if that subject is addressed in here or not, but I think it is a really important topic. H-18

Ed Maddage: My name is Ed Maddage and I'm a cross country skier here in Helena. I think that if we are going to try to minimize conflicts between motorized and non-motorized use and wildlife, we should have more specific trail maps included in such a document so that we can study what the present impacts of the trail systems have been to different wildlife winter ranges. Two areas in particular I'm concerned about - first is the Badger Two Medicine next to Marias Pass where over the last 5-6 years there has been an active snowmobile grooming program in an area that didn't have it before. Much of the area, if I read my map correctly here, corresponds to moose winter range along the southfork of the Two Medicine River and some grizzly bear denning area along the continental divide. H-19

Another area of interest to me is the Gallatin Range south of Bozeman. Parts of the Big Sky Snowmobile trail does go through elk winter range and in fact even some state wildlife ranges. I think it would be appropriate not only to have clear maps of the existing trails and how they interact with wildlife winter ranges, but possibly even examination if there are any impacts from these sorts of things, so we can avoid having huge conflicts in the future. H-20

Lisa Roe: My name is Lisa Roe and my comments are sort of similar to his in that I think the maps should be defined a little better. And I agree with the other gentlemen that snowmobiles need their place but they inherently, because of the noise, impact other people in their activities. So expanding the program and expanding the trail system tends to impact more and more people who perhaps like myself would rather be skiing quietly. Skiers inherently generally don't make enough noise to disturb others as they travel, maybe perhaps talking, but not the noise that snowmobiles make. So I think that you need to have defined areas that they can use and other defined areas where they are not nearby. H-21 Also in particular away from wilderness areas where that is part of the problem, they need to be separated by some means from those areas that are currently wilderness and they definitely should not lead into proposed wilderness or roadless areas. Like I said I think they need their place but you also need to realize that the majority of trail users, contrary to his statement, are non-motorized folks and probably have a preference not to hear a motor while they are out there. H-22

Tom Goldnar: My name is Tom Goldnar and I'm a local Helena resident and I primarily cross country ski but I don't have a vendetta against just anybody who snowmobiles but there are people who abuse the things on wilderness areas. I've seen that down in Wyoming along the Bridger Teton Wilderness Area where I've been in there hiking, skiing, and you can see left over snowmobile trails. I've also been in areas where I would have expected it because there is so much proximity between snowmobiles and wilderness boundary, what I didn't see was tracks but what I did here was the sound of snowmobiles for 2-3 miles within the wilderness boundary. When she talked about the noise issue, she was right.

Snowmobilers didn't know I was within a quarter of a mile of the wilderness boundary or three miles into the wilderness boundary at any time, but I know the schedule of the snowmobilers throughout the day in that area around Cook City quite well. The exhaust fumes are quite noticeable too. H-23

I guess it is just not as apparent to someone on a snowmobile, the sound that they make, because you're surrounded by that sound but if you are away from it you can hear it.

Bob Walker adjourned the public hearing at 8:00 p.m.

3. RESPONSES TO PUBLIC COMMENTS

COMMENT NUMBER	RESPONSE
1-1	See response to comment k-16. The Environmental Review Criteria (ERC) (Appendix A) have been modified to include: "Has applicant provided law enforcement report from Fish, Wildlife, and Parks Region Warden Captain and/or land managing agency identifying documented snowmobile trespass on private lands and/or wilderness areas caused by adjoining or nearby funded trail and proposal for addressing such violations? If yes, go to 30. If no, provide said report."
1-2	Please refer to pages 62 and 31 in the PEIS regarding EPA noise rating for snowmobiles and industry reform, respectively.
1-3	See response to k-19.
1-4	See amendment made on page 1 of Appendix A. Prior to making a final determination that a new or substantially changed application satisfies the criteria for a categorical exclusion, the Department will provide 15 days for public review and comment.
2-1	See response to comments 21-1 & 2-2.
2-2	The one-half of one percent gasoline tax was derived by the legislature using a formula that calculates the percent of gasoline consumption used by snowmobiles in the State of Montana. Alternative 3 in the PEIS, as described on page 20, provides a number of modifications designed to mitigate potential impacts resulting from snowmobile activities on funded state snowmobile trails. In response to public concerns regarding the decision-making process, the Department has expanded the application review committee to include representatives from the appropriate land management agency involved in the site-specific trail proposals (page 22). The PEIS has been modified on page 22 regarding the review of grant applications and the inclusion of members of the general public.
2-3	The Snowmobile Grant Program PEIS is not a proposal or promotional document for development of snowmobile trails in roadless, wilderness, or key wildlife habitat areas. As a programmatic EIS it does not address any specific proposals for trail development or maintenance. Individual proposals for such development or maintenance will be required to comply with all NEPA and MEPA statutory requirements on a site-specific basis. The Department acknowledges the need to avoid wilderness areas, critical wildlife habitat, designated non-motorized areas, and congressionally designated wilderness study areas--the latter two of which have been incorporated into the final PEIS on page

29. This PEIS addresses the need to protect critical wildlife habitat including ungulate winter ranges under Alternative 3 by modifying current procedures (Alternative 1). Avoidance, seasonal restriction, and signing measures in relation to proposed activities near elk winter ranges, grizzly bear hibernation areas and spring range (pages 24 &25) are required under Alternative 3.

2-4 See response to comment k-1.

2-5 The Department, through the Snowmobile Grant Program, has authority for activities on funded snowmobile trails. Activities occurring away from the funded trail boundary are beyond the authority of the Department. The Department will, under Alternatives 1 and 3, make every attempt to work with the appropriate land management agencies to minimize the impacts associated with "off-trail" activities. The Snowmobile Grant Program provides for the organized use of motorized roads and trails by providing funding for grooming activities aimed at less diffuse and more concentrated snowmobile activity.

2-6 The PEIS is not being prepared in response to site specific trail proposals and therefore does not address impacts associated with individual trail systems. As such, it is not necessary to provide maps of the individual trail systems, other than that provided for on page four of the document. When individual trail activities are proposed and the respective land management agency prepares for NEPA or MEPA compliance, then the individual trail maps will be provided and analyzed in the environmental analysis.

2-7 The three alternatives discussed are based on a programmatic approach to the Snowmobile Grant Program, not a site-specific basis. Alternative 3, the Preferred Alternative, incorporates review processes, limitations and mitigative measures for potential impacts identified in the scoping process, including, but not limited to sensitive wildlife habitat, Congressionally designated wilderness study areas, and law enforcement.

2-8 See responses 1 & 3. In sensitive areas, including big game winter range, Congressionally designated wilderness areas, and designated non motorized areas, site specific review will be required under MEPA/NEPA. These reviews must consider alternatives to the proposed action. Further consideration of alternative funding scenarios is beyond the scope of this document and the Department's mandate as provided by the legislature.

2-9 The 1992 survey referenced here does not apply to the issues addressed in this PEIS as the Snowmobile Grant Program does not serve to promote the expansion of motorized recreation areas. The modified grant program (Alternative 3, page 29) identifies the need to avoid designated non-motorized areas, congressionally designated wilderness, and wilderness study areas, and suggests modifications to the existing program directed at fostering such avoidance in cooperation with non-motorized trail users.

3-1 See response to 2-2 & 21-2. The Department of Fish, Wildlife and Parks now administers the National Recreational Trails Fund Act which will provide funds for all trails uses, including cross-country skiers. We are also working with ski clubs in western Montana. Two considerations of those groups are to find a method to fund such trails projects and to consider the formation of a state cross-country skiers association.

3-2 Modifications identified under Alternative 3 in this PEIS have been amended to provide for the avoidance of new trail development into designated non-motorized, and congressionally designated wilderness study areas. The Department acknowledges that such areas are sensitive and therefore provides the necessary mitigating measures to ensure against violation of these areas by trails funded under the grant program.

3-3 See response to comment 2-1.

4-1 The Department does not have an agenda to motorize elk winter range. The Department acknowledges that the program as it currently exists under Alternative 1 has provided funding for some trails that ultimately conflicted with these sensitive areas. Under Alternative 3 in this PEIS, however, the Department has incorporated modifications, or mitigations, designed to foster avoidance and seasonal restrictions on snowmobile activities in elk winter ranges and other sensitive wildlife habitat (page 24 & 25).

5-1 See response to comment 4-1.

5-2 See response to comment k-16 & k-49.

5-3 The number of recent studies commissioned regarding the effects of snowmobiles on various resources are limited. The Department acknowledges that many of the publications referenced in this PEIS are old. In many cases snowmobiles and the resources being considered have changed to a degree where the findings are no longer applicable. However, the bibliography presented in this PEIS serves as a testament to the comprehensive literature review that was conducted to determine the impacts associated with the Snowmobile Grant Program. Of the comprehensive bibliography included in the PEIS, only the first eight pages identify studies that were determined applicable for the purpose of preparing an accurate account of the possible impacts associated with the program. Despite the comprehensive search, the Draft PEIS public involvement process identified two additional studies regarding the impact of motorized vehicles (including snowmobiles) on elk. These studies have been added to the bibliography and referenced where appropriate.

5-4 Despite the Department's exhaustive search for relevant studies, no specific documents were found that specifically addressed the impact of snowmobile noise on wildlife. One document was identified during the public involvement process on the Draft PEIS that related to the impact of mechanized noise on elk. Findings in the PEIS have been modified to reflect some of the conclusions reached by this study. It is assumed, however, that the impacts discussed on pages 80-84 are derived from a combination of the noise from snowmobile and the mobile nature of the machine.

5-5 See response to comment k-1.

6-1 The Department, individual grant sponsors and the respective land management agencies have multi-party agreements established that provide for jurisdictional agreement on various trail proposals. Despite these agreements, individual development or maintenance proposals must still meet NEPA and MEPA requirements on a site-specific basis. Neither this PEIS or the Multi-party agreement provide an exemption to develop or maintain trails on public lands without mandatory compliance with environmental laws and regulations.

6-2 Funding for the Snowmobile Grant Program is derived from one-half of one percent of the gasoline tax. This figure was established by the legislature and is formulated based on a proportional percentage of the total gasoline consumed by snowmobile related activities in Montana.

6-3 See response to comment 3-1.

6-4 See response to comment k-16 & k-49.

7-1 See response to comment 3-2

7-2 Consideration of Bald Eagle nesting areas has been incorporated into the PEIS on pages 24 & 25 and specifically references the need to determine appropriate restrictions on a case-by-case basis.

7-3 Those most determined to circumvent a seasonally restricted area will attempt to do so regardless of the physical constraint. The Department's best tool for reducing infractions will be increased enforcement.

7-4 The public awareness descriptions on page 29 of the PEIS have been revised to include a discussion of safety and trail warnings in shared use areas.

Neither the Department nor a grant sponsor can erect signs on non-funded trails.

7-5 The PEIS's inclusion of non-motorized recreation areas under Issue 9 is designed to include "popular cross-country ski areas". However, the appropriate terminology has been incorporated to clarify primary non-motorized interests.

7-6 The Snowmobile Grant Program provides no authority for the Department to inspect non-funded trail areas. However, through cooperative efforts with the land management agencies, these other areas could be inspected under their authority. Such a decision could be considered during site specific MEPA/NEPA compliance.

7-7 The PEIS has been amended on page 63 to include a discussion of the SCORP findings.

7-8 The PEIS acknowledges on page 101, that land use designations would be impacted in "previously undisturbed areas of forest or rangelands." By virtue of changes incorporated into the final PEIS regarding designated non-motorized and congressionally designated wilderness study areas, trails would not be proposed in these areas, and therefore would result in no changes in land-use.

8-1 See response to comment k-36.

8-2 See response to comments 5-3 & 5-4.

8-3 See response to comment 5-4.

8-4 See response to comment k-3.

8-5 See response to comment k-1.

9-1 See response to comments k-8, 6-1, 4-1 & 2-3

9-2 This programmatic EIS is different from standard EIS's in that it must consider the regional impacts of the Snowmobile Grant Program. This means that site specific impacts, such as those determined on a proposed trail expansion or modification will not be reflected in the PEIS. Rather the PEIS must determine what the impacts to individual resources will be on a statewide or regional level. As individual trail proposals are reviewed under NEPA or MEPA, each could feasibly have potential impacts identified that could be defined as something above negligible to minor or even moderate. In these cases, it will be up to the individual land management agency to work with the grant applicant to develop satisfactory mitigating measures to resolve the potential impact. If no resolution can be developed, the application will ultimately be denied by the Department.

Under Alternative 3 in this PEIS (page 24), modifications (mitigations) have been identified that, upon the Department's decision, will require avoidance, seasonal restrictions, signing and public awareness strategies be built into proposals in critical wildlife habitat such as elk winter ranges, etc. The Bob Marshall EMU, in specifically, is not considered in this PEIS for the reasons described in the beginning of this response. Individual proposals must comply with NEPA/MEPA on a site-specific basis. This compliance must be sought through the appropriate land management agencies.

9-3 See response to comment k-1.

10-1 See response to comment k-8.

10-2 The Department acknowledges that the statements on page iii and 1 are inaccurately stated. The statements have been struck from the document. Site specific environmental documents prepared for individual proposals will not be allowed to simply "tier" the impacts from this Programmatic PEIS. On the contrary, impacts specific to the individually proposed development or maintenance projects will be determined based on the characteristics of the proposed action. The intended idea to be portrayed was that the modifications and recommendations made in regards to the various resources and potential impacts would be brought forward in determining management strategies on individual trail proposals.

See response to comment k-36.

10-3 See response to comments k-16 & 1-7.

10-4 See response to comments 9-2 & 2-3 & 4-1

10-5 See response to comments 5-3 & 5-4

10-6 See response to comment k-1.

11-1 Acknowledged and noted, thank you.

12-1 Acknowledged and noted, thank you.

13-1 Acknowledged and noted, thank you.

14-1 See response to comments 2-3 & 4-1

14-2 The Department acknowledges that there may be impacts to ungulates, in particular, elk (pages 80-84) depending on the site specific characteristics of the proposal and the nature of the elk in question. For this reason, the Department established and has selected as its preferred, Alternative 3, which establishes modifications (mitigations) designed to protect elk in their winter habitat. Please remember that this is a Programmatic EIS, in that it does not address site specific impacts of any proposed action. Individual environmental documents (NEPA/MEPA) will be prepared on a proposal by proposal basis by the appropriate land management agency and in accordance with any management strategies established in the Department's Elk Management Plan.

14-3 See previous response.

14-4 See response to comments k-1 & k-8.

15-1 Acknowledged and noted, thank you.

16-1 Acknowledged and noted, thank you.

17-1 Acknowledged and noted, thank you.

18-1 The PEIS has been modified to include reference of newer model electronic fuel injection (EFI) machines (page 70). However, despite the availability of such machines, impacts as discussed in this PEIS regarding noise and air quality will remain as written since only a percentage of machines utilizing funded trails are EFI. It must also be acknowledged that the snowmobile industry also produces new machines with standard carburation.

18-2 As in all environmental documents prepared in compliance with NEPA and MEPA, the Department must utilize the findings of existing studies, the professional expertise of the resource specialist and site specific characteristics to determine impacts on a local level. The specialists used in preparing environmental documents are selected because of their specialized training and field experience in the individual resource areas. As explained throughout the document and during the public involvement process, this EIS is programmatic in that it does not consider impacts on a site-specific basis. Individual environmental documents will be required under NEPA or MEPA to determine the specific impacts associated with a proposed activity. These specific environmental documents will utilize the findings from the appropriate studies and land management agency expertise to determine specific impacts. As in all NEPA and MEPA compliance cases, the public has the right to challenge the decision made.

18-3 WMA policy is not the issue being addressed in the PEIS. The section of the PEIS referenced in this comment is explaining current responsibilities under the existing Grants Program. It is not a proposal for variance from existing policy and therefore does not require detailed analysis or modification. In short, it is the status quo.

18-4 See response to comment k-8. A PEIS must not only identify potential impacts, but also mitigative measures. A simple listing of federal and state laws would not satisfy the mandates nor administrative rules previously referenced.

18-5 The statement in question refers to reduced use densities in the short term because of the inevitable increase in ridership. To clarify, if trails are expanded given today's number of snowmobiles and riders, densities will certainly be reduced. However, as populations increase, and assuming the number of snowmobilers increases at a proportional rate, use densities would again begin to rise to a point where densities equal those experienced prior to the original expansion. This density increase would continue until trails were expanded or systems connected. In short, the trail use density scenario is cyclical in nature, requiring continued "tuning" until a balance is reached.

18-6 The sentence has been rephrased to read: "...unless traversed by existing roads."

18-7 Again, this is a programmatic EIS, it does not attempt to address site specific issues or impacts. Individual environmental documents prepared for each grant proposal, in compliance with NEPA/MEPA, will define "summer wet meadows." The definition will be based on the unique character of the area and mitigations will be reflective. Because this Programmatic EIS must discuss the impacts and existing conditions on a statewide basis, it would be ineffective to attempt a definition of "summer wet meadows" that would satisfy all scenarios.

18-8 The PEIS has been amended to include alternatives for locating trailheads at higher elevations.

18-9 Yes, bears are known to emerge from hibernation throughout the winter. The impacts addressed in this PEIS are related to the impact of snowmobile activity on the critical period of spring feeding.

18-10 See response to comment 30-2. The PEIS serves to identify potential impacts that could, not will, but could be incurred on individual trail systems. It will be up to the land management agency to determine whether the proposed activity will or will not impact a resource. This determination will be done through the appropriate NEPA/MEPA compliance procedures. In cases where the site-specific environmental review identifies an impact to a resource, the modifications identified in the PEIS would be implemented to mitigate the problem. The PEIS serves as a guidance tool for future planning of trails and other snowmobile facilities.

18-11 The document has been modified on page 29 to read: "Plans would also be developed to necessarily avoid wilderness boundaries, and popular non-motorized...."

18-12 The proposed hourly restrictions could only be established with the full concurrence of the land management agency, local government authority and the private owners. Upon concurrence, however, such restrictions would be valid and appropriate. Remember, the modifications proposed in this PEIS are not policy modifications only.

18-13 As explained in the first paragraph on page 21 of the PEIS, the additional information requested is for the applicant to submit with the application--not for inclusion into trail maps that are distributed for public use. It would be necessary to include such strategies as alternative avoidance routes on the base maps in order for the land management agency and the Department to satisfactorily determine impacts under the various alternatives. Without knowledge of alternative routes, etc., the Department would have no means with which to compare impact levels, and therefore no way to identify a preferred alternative as necessary for approval. However, the information required for inclusion on the map would be entirely up to the Department official and the land management agency preparing the environmental document. Strategies such as signing would, most likely, not require a detailed map showing where each sign would be placed. Such placement strategies would be prepared accordingly with Department personnel.

18-14 The term 'historic' has been added. The sentence now reads: "Signing plan identifying signs to be used in areas of historic conflict with nonmotorized..."

18-15 The document has been modified on page 30 to read: "...and maintenance responsibilities where appropriate and in accordance with management agency policy.

18-16 Law enforcement must be expressed in the PEIS as a mitigative or management measure. Law enforcement may be carried out by the respective land management agencies or through cooperative agreements or memoranda of understanding between agencies. The PEIS only stresses that law enforcement efforts will be increased in some manner.

18-17 Page 70 -- The PEIS states that "with increased fuel efficiencies and resulting reductions in air pollutant emissions from EFI machines, the new model snowmobiles help reduce the air quality problem on a machine by machine basis." Despite this acknowledgment by the Department, it must also be noted that not all owners of snowmobiles can afford the newer machines that exhibit "improvements in noise and pollution control." For this reason, this PEIS cannot assume that the only machines on the trail systems are these upgraded models. The level of impacts are accurately determined to reflect the presence of older machines on the funded trail systems. Individual environmental documents prepared for grant applications will take into consideration the above issues on a system-by-system basis.

18-18 Again, this PEIS strives to identify all possible impacts and appropriate mitigating measures. Not all trail systems will have visibility concerns raised as an issue. In these cases, few steps may be required to mitigate visual intrusions. However, other systems may have a number of areas of concern regarding visual intrusions. In these cases, it would be appropriate to implement measures to avoid these sensitive areas by locating along timber edges or by using topographic features to avoid the identified intrusion. This PEIS does not stipulate each of the modification for all proposed trail projects. Individual environmental documents, prepared by the land management agency, would identify potential visual problems and appropriate mitigations would be incorporated.

18-19 See response to comments k-19 & k-22. The PEIS does not assume the hiring of 1.5 additional FTE but an increase of only 4% of administrative costs.

18-20 Comment noted: Extremely steep slopes (over 60%) are slopes in excess of 54°.

18-21 The document has been modified on page 78 to read: "Although wide tracked vehicles (snowmobiles, groomers, etc.) do exert less vertical pressure on the surface than other vehicles, early and late season...."

18-22 This section provides background information on wildlife in Montana. No reference or relation to snowmobiling is made at any point. As in all EIS's Chapter 4, Environmental Consequences, identifies impacts of the Snowmobile Grant Program on wildlife. No mention is made of snowmobiling being responsible for the extinction of any Threatened or Endangered species.

18-23 The future makeup of the advisory committee will be studied by the Department and you input is noted.

18-24 Discussions of biodiversity and comparison to climax forests are not within the scope of this analysis. However, based on the weight of vegetation per unit area, productivity in wet meadows is rated as low.

18-25 Watershed is defined as a region or area bounded peripherally by a water parting formation (i.e. ridge, hill, mountain range, continental divide) and draining ultimately to a particular watercourse or body of water. There is no formal designation of official watersheds in Montana. Science identifies streams and rivers in terms of orders, or classes of rivers. Each stream order maintains its own scale of watershed. For example, if three headwater streams make up a larger river, each has its own watershed, just as those three streams are within the larger river's watershed. No specific watersheds are addressed in this PEIS, however, individual environmental documents will consider the proposals and their respective impacts on even the smallest of watersheds as determined by hydrologists on a scientific basis.

18-26 The Department requested the most "complete" bibliography of snowmobile related research possible so that references could be used in the future for any studies conducted by the Department or other agencies/organizations. The research in fact is what makes this PEIS objective. Those references not cited in this PEIS have been used in other studies but we did not consider them to be consequential to the PEIS for the Montana Snowmobile Grant Program.

19-1 Page 34 of the PEIS identifies certain potential changes in costs and time associated with program administration. The amount of time which will be necessary to more adequately review program impacts and mitigative measures will increase. The collection of more extensive input from the public, project sponsors, and review of environmental review criteria by project sponsors concerning potential impacts and mitigative measures will increase administrative time. Page 34 also indicates the possibility of increased funds from a state gas tax increase. The state gas tax was, in fact, increased by the 1993 session of the Montana legislature. The expenditure of those funds will be dependent upon future legislative approval to expend those funds through the appropriations process. It is important to note that the administrative costs of the snowmobile program make up only 11.5% of the total expenditures. If Department overhead is added to administrative costs, the total is 22.1% of total expenditures. From a business standpoint, this is a conservative amount for administrative and overhead.

19-2 This EIS is programmatic in nature, which means that no specific trail system or proposal is analyzed. Rather, it addresses the range of potential impacts that could occur given the unique character of each proposal or area of activity. Individual environmental documents will be required for development and maintenance activities proposed. These studies will be under the authority of the land management agency and will take into consideration the status of grizzly populations and their habitat. The PEIS is a proactive strategy in planning for the future of snowmobile use and the anticipated increase in ridership.

19-3 See response to comment 19-1.

20-1 Wildlife behavior varies across Montana and depends on many factors, including historical conditions. Because of this, wildlife will behave or react to snowmobiles in, for example, Yellowstone National Park, differently than in areas of little human activity. Because this is a programmatic EIS, it cannot address trail systems on an individual basis, therefore, to identify the range of possible impacts, the document states that snowmobile activity "could" impact wildlife... This means that when the individual environmental reviews are conducted by the land management agencies, depending on the proposal and the site, impacts could range from both ends of the extreme. Such conclusions are drawn from field expertise, research, and documented observation...not assumptions.

20-2 Again, this PEIS considers the grizzly Bear on a statewide basis, not just in the Hungry Horse area. It strives to identify the range of possible impacts that could occur. Only site specific analyses will determine the impacts at the local level. Throughout the funded trail system, there area some trails that exist in wintering areas. The grant sponsors in these areas have acknowledged the situation and worked cooperatively with the Department and appropriate land management agency to develop a successful mitigation plan designed to provide protection of winter range while providing opportunity for the motorized and non-motorized public.

20-3 Again, this PEIS attempts to identify the range of impacts. Even though an impact identified in the PEIS may not be a threat in one area of the state does not mean that it won't occur under specific conditions found on another system. For this reason, site specific analyses will be conducted by the land management agencies.

20-4 Acknowledged and noted, thank you.

21-1 Page 8, Paragraphs 2 & 4. The vast majority of funded snowmobile trails are on federal lands. The appropriate federal land management agencies are responsible for planning for federal lands. The Department coordinates with federal land managers to ensure federal regulations are satisfied. Those federal regulations include Forest Plans, BLM Resource Management Plans, Travel Management Plans and NEPA environmental review. These planning processes all involve public involvement. Any future trail connections would require the appropriate land managing agencies to satisfy these planning and environmental review processes.

The Department, with assistance from the State Trails Advisory Committee, is initiating a State Trails Plan as a revision to the States Comprehensive Outdoor Recreation Plan. The plan will identify current inventory of trails, needs and desires of the entire trails community, Montana's general public, and possible future trails funding options. In most cases, it will not be site-specific but rather "programmatic." A portion of this plan will naturally deal with snowmobile trails.

21-2 Under Alternative 3 (page 22), the restructured review committee has been incorporated as a modification to the program. The restructured review committee will also include additional representatives from the Department and the appropriate land management agencies as well as the general public.

21-3 The formula used to determine funding for the Snowmobile Grant Program was computed from a study that estimated the amount of distributor gasoline tax paid by snowmobile owners for gas used in snowmobiles.

21-4 This PEIS addresses the Snowmobile Grant Program only. Consideration of funding for other trail programs is beyond the scope of this PEIS, but will be considered within the context of the revisions to the State Comprehensive Outdoor Recreation Plan. See response to comment 21-1.

21-5 See response to comment 21-1.

21-6 Discussion of recreational impacts on page 99 of the PEIS, has been amended to include reference to possible displacement of non-motorized users in areas that previously had no funded snowmobile trails.

21-7 Under the Cumulative Impacts section of the PEIS (page 106), cumulative impacts resulting from summer use of funded snowmobile trails have been acknowledged and addressed. Specific cumulative impacts resulting on specific funded trail systems will be considered in the site specific environmental documents prepared by the appropriate land management agency.

22-1 See response to comment 2-7.

22-2 After further consideration of the Department's conclusions reached in the Draft PEIS, the Final PEIS has been amended to include discussions of "recent studies" that have been conducted in regards to disturbances to wildlife and associated responses. The PEIS has been amended to include the following discussions: Many of the earlier studies, largely of short duration and measuring overt responses, generally conclude that snowmobile activity has limited impacts to ungulate habitat and population distribution. However, more recent physiological studies which lend themselves to measuring more subtle responses, have indicated that snowmobile activity could result in unnecessary stress and energy expenditure by the animals at inopportune times of the year. Rost and Bailey (1979) reported that mule deer and elk avoided roads (vehicle traffic) in Colorado, especially a zone within 200 meters of the road. Stemp

(1983), using heart rate as a measure, also indicated that vehicles approaching and passing were less disturbing to mountain sheep than human intruders and intruder with dog. However, he suggested that off road vehicles moving about the gentler areas of sheep range may be very distressing. MacArthur et al. (1982) in measuring heart rate changes in mountain sheep due to disturbances, reported that in most instances, overt and heart rate responses were quite similar in length. However, they felt that in a population of sheep less habituated to humans, a greater discrepancy would exist with heart rate increases lasting longer than overt responses.

Upon further review, the Department has upgraded the impact conclusions regarding ungulates to moderate in the short term and major in the long term under Alternative 1, major in both the short and long terms under Alternative 2, and minor in both the short and long terms under Alternative 3.

22-3 See response to comment 10-2. The U.S. Forest Service was formally aware on April 27, 1992 that the Department was preparing a Request for Proposals to conduct a Snowmobile Grant PEIS. A meeting was held in Helena that day with representatives of the Forest Service (Tom Donahue), the Bureau of Land Management, the Department and the Montana Snowmobile Association to discuss the project. We also corresponded with Dave Jolly on July 1 about this project. On November 6, Tom Donahue was appointed as the USFS representative on the project.

22-4 The intent of the Snowmobile Grant Program is not to "provide for faster and easier access to undeveloped/unroaded, and/or 'inventoried' roadless areas on the national forests and national resource lands..." Its purpose is to provide for an organized source of recreation aimed at reducing impacts of snowmobiles under a scenario of no regulation. Modern snow machines have the power and their riders, the endurance and will, to access most areas whether or not a funded or groomed system is in existence or not. The Department acknowledges the need to avoid funding of trails in designated non-motorized areas and Congressionally designated wilderness study areas. Discussion of these two areas has been incorporated into the PEIS on page 29.

22-5 Agenda's on the part of individual parties are not regulated by the Department of Fish, Wildlife and Parks. No where will you find that the Department or the Snowmobile Grant Program, nor this PEIS have agenda's to fight ongoing wilderness legislation.

22-6 A Programmatic EIS, by its very nature, cannot address the site specific impacts that each party with an interest in his or her corner of the state feels is of critical importance. Programmatic EIS's are designed to provide, on a program-wide basis, discussion of the possible impacts that could result from implementation of a plan or program. It is not designed to replace site specific analyses as required by NEPA/MEPA on proposals for individual trail activities. Such analyses are still required of the appropriate land management agency. Findings determining specific impacts on these local levels cannot be "tiered" from this PEIS as it provides only a range of impacts that serves to identify potential areas of conflict requiring specific consideration during the site specific environmental compliance.

The contractor assisting in the preparation of this PEIS invites all interested parties to review its "computer system word processor" and library of EIS's prepared by the company. Selecting passages from "what was already on the contractor's computer system word processor," and slightly modifying it to fit the current subject would be quite difficult since only one other recent Programmatic EIS has been prepared at the state level in Montana, and was done so by another consultant for the Montana Department of Agriculture.

23-1 See response to comments 2-3 & 4-1.

23-2 Trails funding for non-motorized trails programs is out of the scope of this document. However, we suggest that you refer suggestions for methods to fund trails to the State Trails Advisory Committee.

24-1 Discussions in the PEIS under Socioeconomics (pages 88-91 & 46-55) present the benefits of snowmobiling to the social and economic settings of communities. An EIS is designed, by law, to be a neutral document that portrays both sides of the issue. The decision maker ultimately uses the information disclosed in the PEIS to determine what impacts weigh more heavily on the decision at hand.

24-2 State Law requires that those funds made available for expenditure by the legislature from snowmobile registration decal fees and state gas tax appropriations will be used for development, maintenance and operation of snowmobile facilities.

25-1 See response to comment 24-2.

25-2 See response to comment 24-1.

25-3 See response to comment 24-1.

25-4 The role of a PEIS is to address the facts. It is a fact that older machines are on the funded trail systems and that they are not as efficient as the newer EFI machines. As long as older machines use the trail systems, their respective impacts must be considered and disclosed. However, the PEIS does not intend to discriminate. Any interpretation of such discrimination is not intentional.

25-5 Conflicts between snowmobiles and non-motorized users of funded trails are addressed on page 99 of the PEIS. Modifications designed under Alternative 3 (page 29) acknowledge and incorporate the need for action regarding shared use of trails. With the implementation of these modifications, shared use of trails can continue with minimal conflict.

26-1 See response to comment 2-3.

27-1 See response to comments 2-3 & 4-1.

28-1 Other uses for funded snowmobile trails as identified in this comment are valid and have been incorporated in the PEIS on page 55.

29-1 See response to comment 2-6.

29-2 The Snowmobile Grant PEIS is programmatic in nature, not site-specific. This is the reason specific trail maps are not included in the document. The three Alternatives discussed are also programmatic. Alternative 3, the preferred alternative, incorporates review processes, limitations and mitigative measures for potential impacts identified in the scoping process including sensitive areas.

29-3 See response to comments 2-2 & 6-2.

29-4 See response to comments 2-3, 4-1, 2-2 & 6-2.

29-5 See response to comment 21-2. The Department of Fish, Wildlife and Parks also administers the National Recreational Trails Fund Act which provides $129,000 for all types of trails. If you have other ideas for trails funding sources, please provide them to the State Trails Advisory Committee.

30-1 Page 96 in the PEIS states clearly that: "Although noise levels of newer snowmobiles have been significantly reduced, older machines are still common on Montana's trail systems..." Despite the advancements of new machines, with quieter more efficient engines, there will always be older snowmobiles on the market and ultimately on the funded trail systems. As long as that possibility remains, documents like this PEIS must address the impacts from those machines as well. Granted, industry is moving to reduce output levels in new machines, but unless they are also planning to retrofit all models built before the improved performance machines, there will always be higher output engines on the trails.

Reference to New York's performance standard is acknowledged on page 95 of the PEIS.

30-2 See response to comment 18-10. As discussed throughout the public involvement process, this EIS is programmatic in nature. By virtue of its definition, the PEIS is not meant to address the specific impacts associated with each proposal for development or maintenance of snowmobile trails. Because of this, it is not possible to state in any definite terms, what the impacts would be for each site given the unique characteristics of both the site and the proposal. With this in mind, it is evident that a document such as this PEIS shouldn't attempt to assign "blanket" impact levels to each resource such as ungulates, vegetation, etc., for each region of the state. The document will stand as is, with the identification of a range of impacts and modifications aimed at mitigating the various impacts. Individuals searching for an exact definition of impacts on trails must become involved in the site specific environmental review that is mandated by both Federal and State law.

30-3 Again, in many site specific cases, there may not be an impact as identified in this PEIS, but since this is a programmatic document, it must address all funded trail systems. The environmental document prepared by the appropriate land management agency on each proposal could, in any case, define impacts at either extreme--positive impact included. This PEIS documents on pages 88-91 the positive economic and social benefits reaped by local communities, families and individuals. However, it is not the role of a programmatic EIS to conduct a blanket cost-benefit analysis for the snowmobile program. Such an analysis would occur on a site specific basis.

30-4 Acknowledged and noted, thank you.

31-1 This is a Programmatic EIS. As such, under MEPA, the PEIS process does not include the site specific identification of impacts to various resources. Under the PEIS process, the Department cannot, and is not required to fund studies on each and every trail system in the state for determination of impacts. The PEIS merely identifies the possible impacts that could occur on a statewide basis. This is because the PEIS is written on the Snowmobile Grant Program...not individual trails or trail systems. Under NEPA and MEPA, when individual proposals for development or maintenance of trails are prepared, the individually proposed plan must comply with NEPA/MEPA. For each individual proposal, the respective land management agency must prepare an environmental document in compliance with the respective State and Federal environmental policy acts. This document would be prepared separately, and result in independent conclusions regarding impacts based on the unique character of the area and proposed activity.

This PEIS was prepared using statistically accurate data from studies that have been conducted over time. The preparers of the PEIS are highly recognized in their respective fields of expertise. Based on the aforementioned research and the specialist's years of experience, the Department feels that the conclusions drawn at the PEIS level, are justifiable and supported under each alternative.

31-2 See response to comment 31-1

31-3 Again, this PEIS does not consider the specifics of each funded trail system. It discusses impacts in general, on a statewide basis, to provide the decision maker with the necessary information from which to make a determination. To reemphasize, the Department's preferred alternative is #3 which acknowledges the impacts discussed in chapter 4 and provides for modifications designed at mitigating those impacts. It is also paramount to remember that each trail system must still comply with NEPA or MEPA by having an environmental document prepared by the respective land management agency. The environmental document will not simply "tier" from this PEIS as it will be required to determine site specific impacts. Some proposals could very well impact resources specifically. In such a case, the land management agency would consult the PEIS for recommended modifications aimed at reducing the impact. If no modifications are suited to mitigate the impact, or if none of the alternatives proposed by the applicant, satisfied NEPA/MEPA, the proposal would not be approved by the land management agency or the Department.

32-1 See response to comment 7-2.

32-2 See response to comment 22-2.

32-3 See response to comments 2-3, 4-1 & 31-3. As explained in the document and throughout the public involvement process, this document is programmatic by nature, and cannot address specific herds on or near individual systems. The PEIS acknowledges impacts to ungulates and offers an alternative aimed at providing mitigating measures designed to address these acknowledged impacts. Mitigating measures specific to a proposal having impacts identified through the NEPA/MEPA compliance process will be drawn from the PEIS and modified, if necessary, to address the impacts of the individual trail project under consideration.

32-4 While the referenced Red Rock Lakes National Wildlife Refuge study does refer to the impacts identified in this comment, it ultimately draws the same conclusions reached in this PEIS. Following discussion of increases in heart rate and basal metabolism (page 5) and the potential for greater impact during the winter and spring, conclusions on page 6 of the Red Rock study ultimately state that: "It is difficult to derive concrete conclusions regarding snowmobile impacts on wildlife populations..." and that "While no one can state categorically that increased use will or will not impose additional stress on wildlife, available evidence suggests that such impacts are a definite possibility." These conclusions, supported by terminology such as "possibly", "can" and "may" coincide with conclusions drawn in this PEIS that state: "Studies on the impacts of snowmobile disturbance to wildlife offer a wide range of conclusions. Winter conditions, particularly where conditions are good for snowmobiling, can be harsh for many species of wildlife." It continues to acknowledge, as does the Red Rock study, that: snowmobiles..."could result in unnecessary stress and energy expenditure at inopportune times of the year." With that in mind, one must be reminded that this EIS is programmatic and cannot address and does not warrant independent research on all wildlife habitat and populations potentially affected by snowmobiling. Individual compliance with NEPA/MEPA by each land management agency reviewing trail development or maintenance proposals will determine specific impacts associated with the proposed activities.

32-5 Pages 86 - 87 of the PEIS discusses indirect impacts (as defined in assumptions on page 65) to vegetation in areas away from trail boundaries. Page 85 addresses, and acknowledges impacts to saplings, but has been amended to clarify the specific impacts to these young trees and saplings in natural regeneration areas and tree plantations.

32-6 Page 83 acknowledges and addresses the impacts to subnivean environments caused by snowmobile induced compaction. It specifically addresses ill health and increased mortality for small mammals in these subnivean environments (Neumann and Merriam 1972).

32-7 Please refer to page 28, Issue 8. "Enforcement. Upon available funding, the Department would increase enforcement efforts on trails to ensure compliance with applicable regulations." This enforcement is accomplished by trained law enforcement officials of the Department and other agencies. Club members would only assist the Department by encouraging snowmobiler to report accidents involving personal property. In fact, the 1993 legislature increased the snowmobile registration decal fee from $2.00 to $5.00, thus increasing the amount to law enforcement from $1.00/registration to $2.50/registration.

32-8 The Draft PEIS explains on page 16 that alternative 1 is the existing program as it has been administered for years, and is programmatically defined as the "no action alternative". Alternative 3, the agency preferred, places much more burden on the snowmobile grant applicant than currently exists under the program. It involves the incorporation of mitigating measures into plans that potentially affect resources and requires much more detailed information for inclusion into the application for review and NEPA/MEPA by the respective land management agency and the Department.

32-9 Approximately $440,000 per year is generated for the snowmobile program from the state gas tax. The Department of Transportation has calculated that to be 5/10 of 1% of the state gas tax. That would be the equivalent of 133 gallons of gas used per snowmobile per year in Montana and this does not take into consideration the gas used in rental snowmobiles nor that used by out-of-state tourists.

33-1 The PEIS acknowledges that impacts are probable under Alternative 1 (existing program). For that reason, Alternative 3 has been selected as the agency's preferred. Alternative 3 provides for a greater system of checks and balances for proposed and existing trail systems. All conclusions reached in the Draft PEIS are based on statistically valid studies and the professional experience of the consultant and Department's staffs and interdisciplinary team members.

33-2 Please refer to PEIS pages 8 and 20 (table 2-1) which make it clear that federal agencies must satisfy federal regulations including, but not limited to, environmental assessments, biological assessments, cultural resource clearance or special use permits. See clarifications added to page 8.

The only Categorical Exclusion criteria specifically identified in the Snowmobile Grant PEIS is specified for the Snowmobile Grant Program. This only applies to an application for state snowmobile funds. On federal lands, the particular land managing agency must satisfy federal mandates and executive orders before funds can be applied for from the state grant program.

33-3 The Snowmobile Grant PEIS provides a specific mechanism for reviewing potential impacts of trails proposals on all resources, including game animals, before any state snowmobile funds are involved. This process will provide another "check and balance" and thus coincides with the Department's responsibilities under MCA 87-1-201(2).

33-4 See response to comment k-1.

34-1 See response to comments 2-3, 4-1, & 32-3.

34-2 See response to comments 5-4 & 22-2.

34-3 The PEIS and Grant Program do not "call for" snowmobile activity in wintering areas. On the contrary, under Alternative 3, impacts to grizzly bears in spring ranges are acknowledged and mitigating measures are identified on page 24, including avoidance and seasonal restrictions in these areas.

34-4 See response to comment k-8 & k-36.

34-5 We are not aware of any state that presently requires a written test before receiving a registration decal but we will investigate. The safety education training program follows a uniform nationally used workbook which incorporates snowmobile ethics and impacts. Our intent is to incorporate interpretive signing to compliment that training. All signs on federal lands must satisfy the respective federal agency signing standards.

34-6 See response to comment 34-5.

34-7 The PEIS acknowledges the potential for destabilization of soils and impacts to vegetation. It also provides, under Alternative 3, mitigation measures designed to avoid such impacts (page 23 and 25 respectively).

34-8 The final PEIS makes it clear that grant moneys will not be approved for projects into congressionally designated wilderness and wilderness study areas or designated non-motorized areas. Because this is a programmatic EIS, this consideration has been included under Alternative 3 as one of many areas for which additional information must be requested of grant applicants.

35-1 Acknowledged and noted, thank you.

35-2 Acknowledged and noted, thank you.

36-1 Acknowledged and noted, thank you.

37-1 See response to comment 21-1.

38-1 See response to comments 2-7 & k-36.

38-2 See response to comment 2-6.

38-3 See response to comment 21-2.

39-1 Aesthetic considerations are perhaps the most difficult to address in a NEPA/MEPA document because of the individual perceptions and value judgments pertaining to the definition of noise. However, this PEIS has attempted to address the physical impacts associated with noise (i.e. irritation, increased heart rates, loss of sleep, muscular weakness, etc..), as well as the less physically oriented impacts such as loss of enjoyment in "pristine" or "naturally quiet" areas for non-motorized users, etc. (pages 95-96). Because this is a programmatic EIS, it does not attempt to discuss noise impacts on a trail or system specific level, and therefore draws general conclusions regarding specific impacts of noise. However, individual proposals for development or maintenance of trails will be required to comply with MEPA/NEPA on an individual basis. The environmental analysis conducted on the site specific level will provide greater opportunity to identify unique noise issues and subsequent mitigation measures.

39-2 The final PEIS makes it clear that we will not approve grants to projects involving congressionally designated wilderness and wilderness study areas, or designated non-motorized areas. Also see response to comment k-1.

40-1 Page 26 identifies modifications designed to reduce impacts on vegetation and the spread of noxious weeds under Alternative 3. Public awareness strategies regarding the spread of noxious weeds has been added to the "Education" discussion.

40-2 Being a programmatic EIS, it is difficult to address the issue of erosion without site specific data and analyses to support findings. This programmatic EIS serves only to identify the potential for erosion impacts from snowmobiling and recommends modifications to the Grants Program for mitigating those impacts. Such analyses and determination of specific impacts will be the responsibility of the appropriate land management agency in compliance with respective NEPA/MEPA environmental documents.

40-3 A grooming start and completion date is an excellent idea for managing the grooming program to reduce impacts during light snow conditions. Some of our grooming contracts no limit the grooming start-up date to December 1. We will consider this option in the future.

40-4 Acknowledged and noted, thank you. Alternative 3 does consider strategies for improving safety along trails, including improved signing and awareness programs.

41-1 See response to comment 2-9.

41-2 See response to comment k-36.

41-3 See response to comment k-1.

41-4 See amendment made on page 1 of Appendix A. Prior to making a final determination that a new or substantially changed application satisfies the criteria for a categorical exclusion, the Department will provide 15 days for public review and comment.

41-5 See response to comment 21-1

41-6 See response to comment 22-4.

41-7 The PEIS doesn't use Yellowstone as a model. It addresses impacts to ungulates on a more regional basis and attempts to identify modifications to the existing program that could be used on specific trails or trail systems to mitigate the range of potential impacts unique to that area or resource. See response to comment 32-4.

41-8 See response to comment 5-4 & 32-4.

41-9 Acknowledged and noted, thank you.

41-10 The Department acknowledges the validity of the comment and has amended the modifications under Alternative 3 (page 24) to include known denning areas. It is the intent of the Department to carefully plan for avoidance and seasonal restrictions, since signing and posted restricted areas often attract visitors on foot and machine to view the wildlife in their habitat. Specific dates for restricted travel would be determined on a case by case base and identified in the land management agency's NEPA/MEPA compliance document. Although this PEIS addresses mitigation measures designed at protecting such areas, the program has no administrative jurisdiction away from the funded trail system.

41-11 See response to comment 2-3, 2-5, 7-3, 7-6, 22-4 & 4-1 regarding Congressionally designated wilderness study areas, designated non-motorized areas, and winter range habitat. See response to comment above regarding seasonal restrictions. Although indirect impacts are acknowledged by the department, activities beyond funded trails are not within the jurisdiction of the Department.

41-12 See response to comment 22-4. Indirect impacts associated with the Snowmobile Grant Program are similar in nature to those direct impacts identified in the PEIS. Although the Department has no jurisdiction over activities beyond the funded trail system, it acknowledges that indirect impacts do exist and that, without regulation under the Grant Program, could result in isolated instances with individual resources being impacted more so than similar resources along funded trails. This discussion of indirect impacts has been incorporated into the PEIS. Land management agency NEPA/MEPA compliance procedures will consider direct and indirect impacts on a project-by-project basis.

41-13 See response to comments 2-3 & 4-1.

41-14 See response to comments k-16, 1-1 & changes incorporated into the final PEIS on page 33 regarding enforcement.

42-1 See response to comment 2-6.

42-2 See response to comment k-36, 2-2 & 2-7.

42-3 See response to comment 21-2, k-1 & k-3.

42-4 See response to comment 2-2.

42-5 See response to comments 2-3 & 4-1.

43-1 Acknowledged and noted, thank you.

44-1 Acknowledged and noted, thank you.

45-1 See response to comment 21-2 and refer to changes made on page 17 of the PEIS.

45-2 See response to comment k-16.

46-1 See response to comment k-16.

46-2 We have not had reports of road damage caused by snowmobile trails runoff. However, the snowmobile grant dollars may be used for such repairs if documented by the managing agency(ies).

47-1 See response to comment 2-3, 4-1 & 9-2.

47-2 See response to comment 9-2.

47-3 Modifications proposed under Alternative 3 on pages 28 and 29 speak to the concerns reflected in this comment. Specifically, hourly restrictions have been proposed as a means of mitigating disturbance on private property, residential neighborhoods, and sensitive areas within communities.

48-1 See response to comment k-1.

48-2 See response to comments 2-3, 4-1 & 9-2.

48-3 See response to comment k-3.

48-4 See response to comments 2-3, 4-1 & 9-2.

48-5 See response to comments k-8, k-1 & k-36.

48-6 See response to comments 2-2, 2-7, k-16 & k-49.

49-1 See response to comments 21-2 & 29-5.

50-1 See response to comments 2-3, 4-2 & 9-2.

50-2 Acknowledged and noted, thank you.

51-1 See response to comment 21-2.

52-1 Acknowledged and noted, thank you.

53-1 See response to comments k-36 & 22-3.

53-2 See response to comments k-1, 21-1, 21-3 & amendment made on page 1 of Appendix A. Prior to making a final determination that a new or substantially changed application satisfies the criteria for a categorical exclusion, the Department will provide 15 days for public review and comment.

53-3 See response to comment 21-1.

53-4 See response to comments 2-3, 4-1 & 9-2.

53-5 See response to comment k-16. Your suggested verbage for boundary signs of non-motorized areas and wilderness areas has been noted and will be considered, thank you.

53-6 See response to comments 3-1 & 23-2. Funding for non-motorized trails programs is out of the scope of this PEIS.

53-7 See response to comments 7-4, 7-5, 2-3 & 4-1.

53-8 See response to comments 9-2, 5-3, 5-4, 2-3 & 4-1. In regards to the comment regarding the state's Elk Management Plan, the Department agrees that trails funded under the Grant Program must comply with elk management strategies pertaining to snowmobiles identified in the Elk Management Plan.

54-1 See response to comments 18-10 & 30-2.

54-2 The Snowmobile Grant Program PEIS was prepared by Morrison Maierle Environmental Corporation of Helena, Montana. See list of preparers and respective qualifications on paged 108-110.

54-3 Most snowmobile trailheads are located at lower elevations since most snowmobilers must access funded trail system with snowmobile in tow. Most trails funded under the grant program extend out from these trailheads destined for higher elevations with more snow and better conditions for riding. However, several funded trails routes have historically passed through or near winter ranges as a means to access the higher elevations. Any wildlife biologist in Montana will acknowledge that there are many areas across the state that are utilized as winter ranges by ungulates yet maintain sufficient snowcover for effective snowmobile operation.

54-4 See respective changes in Final PEIS on page 83. Recent studies of radio-collared grizzly bears have shown that females and females with cubs were generally found in high elevation habitats covered by snow from mid-October through mid-may. During post-denning periods, females with cubs are less mobile than other bears and remain near the den site from early April through mid-May. Thus high elevation snowmobiling during mid to late spring could increase the potential for encounters with post-denning bears (Mace and Manley, Pers. Commun.). Bears do not search for food solely at lower elevations. Grizzly bears often scavenge higher altitude avalanche "runouts" for carcasses of animals unfortunate enough to have been caught in avalanches over the winter.

b-1 Acknowledged and noted, thank you.

b-2 See response to 21-1 & 21-4.

b-3 Acknowledged and noted, thank you.

k-1 Please refer to PEIS pages 8 and 20 (table 2-1) which make it clear that federal agencies must satisfy federal regulations including, but not limited to, environmental assessments, biological assessments, cultural resource clearance or special use permits. See clarifications added to page 8.

The only Categorical Exclusion criteria specifically identified in the Snowmobile Grant PEIS is specified for the Snowmobile Grant Program. This only applies to an application for state snowmobile funds. On federal lands, the particular land managing agency must satisfy federal mandates and executive orders before funds can be applied for from the state grant program.

k-2 See response to comments 2-3, 4-1 & 9-2.

k-3 The Snowmobile Grant PEIS provides a specific mechanism for reviewing potential impacts of trails proposals on all resources, including game animals, before any state snowmobile funds are involved. This process will provide another "check and balance" and thus coincides with the Department's responsibilities under MCA 87-1-201(2).

k-4 See response to comment 1-1.

k-5 See response to comments 54-4, 31-1, 34-3, 19-2 & 2-3.

k-6 Acknowledged and noted, thank you.

k-7 Acknowledged and noted, thank you.

k-8 Please refer to page 1, *Purpose of the PEIS and Scope of Analysis.* Under the Montana Environmental Policy Act, the Department is required to prepare a detailed statement on environmental impacts of programs significantly affecting the environment, 75-1-201(1) (b)(iii), MCA. Under Department rules, an "action" includes a program directly undertaken by an agency and projects or activities supported through a grant, ARM 12.2.429(1). The Department must do a "programmatic review" to analyze the impacts of a series of actions, programs or policies, ARM 12.2.444(1). If a project funded through a snowmobile grant is on federal land, the federal agency may also be required to do a site-specific NEPA review, unless the project falls within on of its own categorical exclusions.

k-9 See response to comments 54-4, 31-1, 34-3, 19-2 & 2-3.

k-10 See response to comment 9-2.

k-11 See response to comment 21-1.

k-12 Acknowledged and noted, thank you.

k-13 Your point on predation is well taken. Snowmobile trails could indeed make it easier for predators to travel, however, animals such as bears, coyote and wolf will prey on the young and weak despite the ease of access to winter range. Thank you for your comment.

k-14 See response to comments 2-3 & 4-1.

k-15 The 78 dB level, as discussed on page 62 of the PEIS, is EPA's noise rating for the snowmobile industry. All snowmobiles built after June 30, 1975 are not to exceed the EPA mandated 78 dB level.

k-16 See response to comment 1-1. Also see respective changes to PEIS, pages 28 and 33.

k-17 The Department agrees with the comment on objectivity regarding the inclusion of results from user perception survey that was conducted and incorporated into the Draft PEIS. The entire section on user perceptions has been eliminated from the final PEIS.

k-18 The programmatic nature of this EIS prevents the Department from quantifying the terminology used to rate the level of impacts under each resource. As suggested in the comment, an assumption has been added on page 66 that identifies the potential for significantly different impact determinations on a local level. Such is the nature of a programmatic EIS.

k-19 The Snowmobile Grant Program PEIS findings will be applied to all snowmobile trail projects requesting funds from the Department. Snowmobile trails that have been funded prior to the effective date of the PEIS will have three years from the date of decision to satisfy conditions of the PEIS. Any new trails, or existing trails previously unfunded, that apply for state snowmobile grants from the Department after the effective date of the PEIS must satisfy the conditions of the PEIS.

k-20 Appropriate considerations have been added to the checklist that identify a finite range of resubmittals and subsequent rejection option.

k-21 See response to comment 2-3 & 4-1.

k-22 Page 34 of the PEIS identifies certain potential changes in costs and time associated with program administration. The amount of time which will be necessary to more adequately review program impacts and mitigative measures will increase. The collection of more extensive input from the public concerning potential impacts and mitigative measures will increase administrative time. Page 34 also indicates the possibility of increased funds from a state gas tax increase. The state gas tax was, in fact, increased by the 1993 session of the Montana legislature. The expenditure of those funds will be dependent upon future legislative approval to expend those funds through the appropriations process. It is important to note that the administrative costs of the snowmobile program make up only 11.5% of the total expenditures. If Department overhead is added to administrative costs, the total is 22.1% of total expenditures. From a business standpoint, this is a conservative amount for administrative and overhead.

k-23 See response to comment 19-3 & 18-24

k-24 See response to comment K-22.

k-25 See response to comment 41-7 & 20-1.

k-26 See response to comment 20-6.

k-27 See response to comment 20-3.

k-28 Acknowledged and noted, thank you.

k-29 See response to comment 18-17.

k-30 See response to comment 54-4 & 19-2. Please remember that this is a programmatic EIS in that it is not intended to address impacts on a site specific basis. However, because bear behavior and habitat varies across Montana, this PEIS must consider the range of possible impacts.

k-31 See response to comment 18-10.

k-32 See response to comments k-1 & k-8.

k-33 See response to comment k-1.

k-34 See response to comment 5-3, 5-4 & 22-2.

k-35 See response to comment 9-2 & 41-7. Consultation with Regions 1 and 4 resulted in the identification of studies related to wildlife disturbance from harassment and mechanized disturbances. These studies have been reviewed and results are discussed in response to comment 22-2.

k-36 The CEQ has developed two interpretations of "no action" depending on the nature of the proposal:

1) no change from the current status quo; or
2) the proposed action does not take place.

The first interpretation covers situations such as the one in question where current management or an on-going program is taking place. Thus the PEIS properly utilized the on-going program as the "no action" alternative. The PEIS also analyzed the alternative of no program.

The U.S. Forest Service was not designated as a joint lead agency because the money for the specific grant program impacted by the PEIS consists of state funds only. Although many of the snowmobile trails are located on USFS lands, these project must be covered by site-specific environmental review or under the appropriate federal agency's categorical exclusions. The purpose of this PEIS is to evaluate the state grant program and provide guidance for projects, not to replace the need for site-specific review.

See response to comment k-16.

k-37 See response to comment 2-9.

k-38 See response to comment 41-6.

k-39 See response to comments 32-4 & 41-7.

k-40 See response to comments 5-4 & 32-4.

k-41 Acknowledged and noted, thank you.

k-42 See response to comments 41-10 & 41-11

k-43 See response to comment 41-11 & k-16.

k-44 See amendment made on page 1 of Appendix A. Prior to making a final determination that a new or substantially changed application satisfies the criteria for a categorical exclusion, the Department will provide 15 days for public review and comment.

k-45 See response to comment k-36.

k-46 See response to comment k-1.

k-47 See response to comments k-3 & 22-2.

k-48 See response to comment k-8, k-16 & k-36.

k-49 Increased education activities are incorporated throughout the PEIS. Please refer to pages 22, 23 & 25-30.

k-50 Acknowledged and noted, thank you.

k-51	Acknowledged and noted, thank you.
k-52	See responses to letters 18 & 30.
k-53	Noted and acknowledged, thank you.
h-1	Noted and acknowledged, thank you.
h-2	See response to comments 2-3 & 4-1.
h-3	Acknowledged and noted, thank you.
h-4	See response to comment 2-1 & 2-2.
h-5	See response to comment 2-2, 21-1, 21-2 & PEIS page 2.
h-6	See response to comment 2-3 & 4-1.
h-7	See response to comment 2-4.
h-8	See response to comment 2-6.
h-9	See response to comment 2-7.
h-10	See response to comment 2-9.
h-11	See response to comment 2-1.
h-12	Acknowledged, correction has been made to the figure.
h-13	Acknowledged and noted, thank you.
h-14	Please refer to page 17..."These responsibilities would include...application assistance.." After completion of the Snowmobile Grant PEIS, the Helena Office of Fish, Wildlife and Parks will provide PEIS compliance educational assistance to the Regional Parks Managers and snowmobile grant program sponsors. The Regions will provide guidance to grant applicants for PEIS compliance.
h-15	Acknowledged and noted, thank you.
h-16	Acknowledged and noted, thank you.
h-17	See response to comment 2-7 & k-36.
h-18	Acknowledged and noted, thank you.
h-19	See response to comments 2-3, 4-1, 2-6, 19-2, 20-2, 34-3 & 54-4.
h-20	See response to comments 2-3 & 4-1.

h-21 The PEIS has been modified to clarify that the Department will not approve grants to projects involving wilderness, Congressionally designated wilderness study areas or designated non-motorized areas. Also see response to comment k-1.

h-22 See response to comment 39-1.

h-23 Acknowledged and noted, thank you.

250 copies of this document were published at an estimated cost of $8.50 per copy for a total cost of $2,125.00, which includes $1,400.00 for printing and $725.00 for distribution. These printing and distribution costs were paid by the Department of Fish, Wildlife and Parks.

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